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12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

15 VERNON UNSWORTH,

16 Plaintiff,

18 vs.

19 ELON MUSK,

20 Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF MICHAEL T. LIFRAK IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT, OR IN  
THE ALTERNATIVE PARTIAL  
SUMMARY JUDGMENT**

Complaint Filed: September 17, 2018  
Trial Date: December 2, 2019

Hearing Date: October 28, 2019  
Time: 1:30 p.m.  
Courtroom: 10A

1           **I, Michael T. Lifrak, declare as follows:**

2           1.       I am a member of the bar of the State of California and a partner at  
3 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Elon Musk. I  
4 make this declaration of personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6           2.       I submit this declaration in support of Mr. Musk's Motion for Summary  
7 Judgment, or in the Alternative, Partial Summary Judgment.

8           3.       A video of an interview of Plaintiff Vernon Unsworth on BBC-Thai  
9 regarding the Thai Cave Rescue, dated June 29, 2018, is available at  
10 [https://forum.thaivisa.com/topic/1045468-bbc-interview-with-british-cave-expert-in-](https://forum.thaivisa.com/topic/1045468-bbc-interview-with-british-cave-expert-in-chiang-rai/)  
11 [chiang-rai/](https://forum.thaivisa.com/topic/1045468-bbc-interview-with-british-cave-expert-in-chiang-rai/).

12          4.       Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from  
13 the August 14, 2019 deposition of Vernon Unsworth in this case.

14          5.       Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from  
15 the August 22, 2019 deposition of Elon Musk in this case.

16          6.       Attached hereto as **Exhibit 3** is a true and correct copy of Richard C.  
17 Paddock, Martha Suhartono, *Thailand Cave Rescue Turns to How to Extract*  
18 *Trapped Soccer Team*, The New York Times (July 3, 2018),  
19 <https://www.nytimes.com/2018/07/03/world/asia/thai-cave-rescue-soccer-team.html>.

20          7.       Attached hereto as **Exhibit 4** is a true and correct copy of Nick Fagge,  
21 *British caver is hailed a 'magician' after convincing Thai officials to bring in heroic*  
22 *UK divers who found stranded schoolboys, aided by his knowledge of the tunnels*,  
23 The Daily Mail (July 4, 2018, updated July 5, 2018),  
24 [https://www.dailymail.co.uk/news/article-5918745/Brit-caver-hailed-magician-](https://www.dailymail.co.uk/news/article-5918745/Brit-caver-hailed-magician-convincing-Thai-officials-bring-hero-divers-boys.html)  
25 [convincing-Thai-officials-bring-hero-divers-boys.html](https://www.dailymail.co.uk/news/article-5918745/Brit-caver-hailed-magician-convincing-Thai-officials-bring-hero-divers-boys.html).

26          8.       Attached hereto as **Exhibit 5** is a true and correct copy of Rebecca  
27 Wright, Hilary Clarke, *British diver recalls Thai cave rescue: 'Are we heroes? No,*  
28



1 CNN (July 13, 2015, updated July 15, 2018),

2 <https://www.cnn.com/2018/07/13/uk/thai-cave-rescue-british-divers-intl/index.html>.

3 9. Attached hereto as **Exhibit 6** is a true and correct copy of Philip  
4 Sherwell, *Exclusive interview with cave rescue hero Vernon Mr. Unsworth: 'If the*  
5 *Brits hadn't been called in, it would have been too late'*, The Sunday Times (July 15,  
6 2018), [https://www.thetimes.co.uk/article/exclusive-interview-with-thai-cave-rescue-](https://www.thetimes.co.uk/article/exclusive-interview-with-thai-cave-rescue-hero-vernon-unsworth-if-the-brits-hadn-t-been-called-in-it-would-have-been-too-late-qhdpbw8bm)  
7 [hero-vernon-unsworth-if-the-brits-hadn-t-been-called-in-it-would-have-been-too-](https://www.thetimes.co.uk/article/exclusive-interview-with-thai-cave-rescue-hero-vernon-unsworth-if-the-brits-hadn-t-been-called-in-it-would-have-been-too-late-qhdpbw8bm)  
8 [late-qhdpbw8bm](https://www.thetimes.co.uk/article/exclusive-interview-with-thai-cave-rescue-hero-vernon-unsworth-if-the-brits-hadn-t-been-called-in-it-would-have-been-too-late-qhdpbw8bm).

9 10. Attached hereto as **Exhibit 7** is a true and correct copy of Sean Flynn,  
10 *Miracle At Tham Luang*, GQ Magazine (December 3, 2018),  
11 <https://www.gq.com/story/thai-cave-rescue-miracle-at-tham-luang>.

12 11. Attached hereto as **Exhibit 8** is a true and correct copy of John Ruch,  
13 *Battle against Tesla CEO is latest high-profile case for local libel lawyer*, Reporter  
14 Newspapers (September 28, 2018),  
15 [https://www.reporternewspapers.net/2018/09/28/battle-against-tesla-ceo-is-latest-](https://www.reporternewspapers.net/2018/09/28/battle-against-tesla-ceo-is-latest-high-profile-case-for-local-libel-lawyer/)  
16 [high-profile-case-for-local-libel-lawyer/](https://www.reporternewspapers.net/2018/09/28/battle-against-tesla-ceo-is-latest-high-profile-case-for-local-libel-lawyer/).

17 12. Attached hereto as **Exhibit 9** is a true and correct copy of Plaintiff  
18 Vernon Unsworth's Responses and Objections to Elon Musk's First Set of  
19 Interrogatories.

20 13. Attached hereto as **Exhibit 10** is a true and correct copy of the July 18-  
21 21, 2018 email correspondence between Mark Stephens, journalist Philip Sherwell,  
22 and Vernon Unsworth, produced as VU0050-01.

23 14. Attached hereto as **Exhibit 11** is a true and correct copy of the August  
24 18, 2018 email correspondence between Philip Sherwell and Vernon Unsworth,  
25 produced as VU00478.

26 15. Attached hereto as **Exhibit 12** is a true and correct copy of the March  
27 16-19, 2019 email correspondence between Vernon Unsworth and Matt Gutman,  
28 ABC News Chief National Correspondent, produced as VU00511-12.

1           16. Attached hereto as **Exhibit 13** is a true and correct copy of Vernon  
2 Unsworth's Whatsapp conversations with Jonathan Volanthen, a member of the cave  
3 rescue dive team, that took place between February 3, 2019 and May 8, 2019,  
4 produced as VU00663-64.

5           17. Attached hereto as **Exhibit 14** is a true and correct copy of Julia Jacobs,  
6 *Elon Musk Thinks a Mini-Submarine Could Help in Thai Cave Rescue*, The New  
7 York Times (July 7, 2018), [https://www.nytimes.com/2018/07/07/world/asia/elon-](https://www.nytimes.com/2018/07/07/world/asia/elon-musk-thai-cave-rescue.html)  
8 [musk-thai-cave-rescue.html](https://www.nytimes.com/2018/07/07/world/asia/elon-musk-thai-cave-rescue.html).

9           18. Attached hereto as **Exhibit 15** is a true and correct copy of Muktita  
10 Suhartono and Julia Jacobs, *Elon Musk Defends His Rejected Mini-Sub Plan for Thai*  
11 *Cave*, The New York Times (July 10, 2018),  
12 [https://www.nytimes.com/2018/07/10/world/asia/elon-musk-thailand-cave-](https://www.nytimes.com/2018/07/10/world/asia/elon-musk-thailand-cave-submarine.html)  
13 [submarine.html](https://www.nytimes.com/2018/07/10/world/asia/elon-musk-thailand-cave-submarine.html).

14           19. Attached hereto as **Exhibit 16** is a true and correct copy of *Why was*  
15 *Elon Musk at the Thai cave rescue?*, BBC (July 10, 2018),  
16 <https://www.bbc.com/news/technology-44779998>.

17           20. Attached hereto as **Exhibit 17** is a true and correct copy of Adam Clark  
18 Estes, *Is Elon Musk Serious?*, Gizmodo (July 10, 2018), [https://gizmodo.com/is-](https://gizmodo.com/is-elon-musk-serious-1827456578)  
19 [elon-musk-serious-1827456578](https://gizmodo.com/is-elon-musk-serious-1827456578).

20           21. Attached hereto as **Exhibit 18** is a true and correct copy of Christopher  
21 Brenner, *Elon Musk hits back at criticism over inserting himself in Thai boys cave*  
22 *rescue*, The New York Daily News (July 11, 2018),  
23 <https://www.nydailynews.com/news/world/ny-news-elon-thai-07112018-story.html>.

24           22. Attached hereto as **Exhibit 19** is a true and correct copy of Muktita  
25 Suhartono and Julia Jacobs, *Thai Navy May Put Elon Musk's Mini-Submarine to*  
26 *Use. One Day*, The New York Times (July 12, 2018),  
27 [https://www.nytimes.com/2018/07/12/world/asia/elon-musk-thai-cave-submarine-](https://www.nytimes.com/2018/07/12/world/asia/elon-musk-thai-cave-submarine-nyt.html)  
28 [nyt.html](https://www.nytimes.com/2018/07/12/world/asia/elon-musk-thai-cave-submarine-nyt.html).

23. Attached hereto as **Exhibit 20** is a true and correct copy of Shibani Mahtani and Steve Hendrix, *Time is running out': Inside the treacherous rescue of boys trapped in a Thai cave*, The Washington Post (July 13, 2018), [https://www.washingtonpost.com/world/time-is-running-out-inside-the-treacherous-rescue-of-boys-trapped-in-thai-cave/2018/07/13/df335afe-8614-11e8-8f6c-46cb43e3f306\\_story.html?noredirect=on](https://www.washingtonpost.com/world/time-is-running-out-inside-the-treacherous-rescue-of-boys-trapped-in-thai-cave/2018/07/13/df335afe-8614-11e8-8f6c-46cb43e3f306_story.html?noredirect=on).

24. An interview dated July 13, 2018 of Vernon Unsworth on CNN regarding the Thai Cave Rescue is available at <https://money.cnn.com/video/technology/2018/07/15/vernon-unsworth.cnnmoney/index.html> and a second version at <https://www.facebook.com/cnn/videos/10158544105061509/?v=10158544105061509>

9. Attached hereto as **Exhibit 21** is a true and correct copy of a transcript of this interview that I oversaw the creation of and which accurately reflects the portion of the interview captured on video.

25. Attached hereto as **Exhibit 22** is a true and correct copy of a tweet posted by L. Lin Wood to Twitter on August 28, 2018.

26. Attached hereto as **Exhibit 23** is a true and correct copy of the July 14-15, 2018 email correspondence between Richard Stanton, Vernon Unsworth, and Jonathan Head of the BBC, produced as VU00003-05.

27. Attached hereto as **Exhibit 24** is a true and correct copy of BuzzFeed News' Standards and Ethics Guide in effect on August 30, 2018 and September 4, 2018, produced as BuzzFeed002-1-10.

28. Attached hereto as **Exhibit 25** is a true and correct copy of BuzzFeed News' current Standards and Ethics Guide, as amended in November 2018.

29. Attached hereto as **Exhibit 26** is a true and correct copy of Ryan Mac, *In an new email, Elon Musk accused a cave rescuer of being a "child rapist" and said he "hopes" there's a lawsuit*, BuzzFeed (September 4, 2018),

1 [https://www.buzzfeednews.com/article/ryanmac/elon-musk-thai-cave-rescuer-](https://www.buzzfeednews.com/article/ryanmac/elon-musk-thai-cave-rescuer-accusations-buzzfeed-email)  
2 [accusations-buzzfeed-email](https://www.buzzfeednews.com/article/ryanmac/elon-musk-thai-cave-rescuer-accusations-buzzfeed-email).

3 30. A video of an interview of Plaintiff Vernon Unsworth with TIME, titled,  
4 *A Diver Who Helped Rescue Thai Kids May Sue Elon Musk Over His 'Pedo' Tweet*,  
5 published July 16, 2018, is available at  
6 [https://www.youtube.com/watch?v=uDP6\\_4jUmiQ&app=desktop](https://www.youtube.com/watch?v=uDP6_4jUmiQ&app=desktop). Attached hereto  
7 as **Exhibit 27** is a true and correct copy of a transcript of this interview that I  
8 oversaw the creation of and which accurately reflects the portion of the interview  
9 captured on video.

10  
11 I declare under penalty of perjury under the laws of the State of California that  
12 the foregoing is true and correct and that this document was executed in Los  
13 Angeles, California.

14  
15 DATED: September 16, 2019

16  
17 By 

18 Michael T. Lifrak  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT 1

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3  
4

5 VERNON UNSWORTH,  
6 Plaintiff,  
7 vs. Case No. 2:18-cv-8048  
8 ELON MUSK,  
9 Defendant.

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10  
11 VIDEOTAPED DEPOSITION OF VERNON UNSWORTH  
12 BEVERLY HILLS, CALIFORNIA  
13 AUGUST 14, 2019  
14  
15  
16  
17  
18

19 Reported By:  
20 PATRICIA Y. SCHULER  
21 CSR No. 11949

22 Job No. 41370  
23  
24  
25

1 Q. Soi Su Nee. 10:18:55

2 A. No. 10:18:57

3 Q. Have you ever been to Pattaya, Thailand, 10:19:10

4 or Pattaya Beach? 10:19:12

5 MR. WOOD: Which one do you want him to 10:19:15

6 answer? 10:19:16

7 BY MR. SCHWARTZ 10:19:16

8 Q. Are those two different places? 10:19:16

9 A. Yes. 10:19:20

10 Q. Let's talk about Pattaya, P-a-t-t-a-y-a, 10:19:21

11 Thailand. 10:19:22

12 Have you ever been there? 10:19:26

13 A. No. 10:19:27

14 Q. Have you been to the Su Nee Plaza in 10:19:29

15 Pattaya? 10:19:31

16 A. No. 10:19:33

17 Q. Strike the "in Pattaya," but have you 10:19:34

18 ever been to Su Nee Plaza? 10:19:35

19 A. No. 10:19:37

20 Q. Have you ever been to the Penthouse 10:19:38

21 Hotel? 10:19:40

22 A. Where? 10:19:43

23 Q. In Thailand. 10:19:43

24 A. No. 10:19:45

25 MR. WOOD: Is that the one with the 10:19:46



1 poles? 10:19:47

2 MR. SCHWARTZ: I don't know. 10:19:48

3 MR. WOOD: You want to take a break now? 10:19:48

4 We've been going about an hour and a half. 10:19:55

5 MR. SCHWARTZ: Let's take a break. 10:19:57

6 THE WITNESS: Thank you. 10:19:59

7 THE VIDEOGRAPHER: The time is 10:19 a.m. 10:19:59

8 We are off the video record. 10:20:00

9 (Recess taken.) 10:38:09

10 THE VIDEOGRAPHER: The time is 10:37 a.m. 10:38:09

11 We are back on the video record. 10:38:11

12 BY MR. SCHWARTZ: 10:38:13

13 Q. Mr. Unsworth, can you grab Exhibit 8. It 10:38:14

14 is the top exhibit on that stack of exhibits next 10:38:15

15 to you. I want to ask you some questions about it. 10:38:16

16 This was that -- you're looking at an 10:38:20

17 email thread from July 2018, and I am going to ask 10:38:21

18 you about the first page of this. 10:38:25

19 You forwarded this email to Jonathan Head 10:38:29

20 the BBC, correct? 10:38:35

21 A. Yes. 10:38:42

22 Q. And the cover note that you wrote to him 10:38:43

23 says "Hi, Jonathan. For your eyes only and not to 10:38:48

24 be reported on" -- and there are three exclamation 10:38:51

25 points. 10:38:56

1 Do you see that? 10:38:57

2 A. Yes. 10:39:00

3 Q. You wrote: "For your eyes only and not to 10:39:00

4 be reported on." 10:39:01

5 Did you discuss that with Mr. Head before 10:39:04

6 you sent this to him? 10:39:07

7 A. Not that I recall. 10:39:15

8 Q. And was it your expectation that, by 10:39:16

9 writing "For your eyes only and not to be reported 10:39:17

10 on," that he wouldn't put this into a story? 10:39:19

11 A. As I say in the email, it's just for his 10:39:29

12 eyes only. 10:39:31

13 Q. Meaning? 10:39:33

14 A. For his eyes only. 10:39:34

15 Q. Is the implication of that that you were 10:39:36

16 telling him that he was not to include this 10:39:38

17 information in a story? When you say "and not to 10:39:42

18 be reported on," is that what you meant? 10:39:45

19 A. Yes. 10:39:49

20 MR. WOOD: Are you done with 8? 10:40:06

21 MR. SCHWARTZ: Yes, we are done with 8. 10:40:09

22 BY MR. SCHWARTZ: 10:40:17

23 Q. So if you look in the interrogatories, 10:40:19

24 that's Exhibit 2 -- your answers to the 10:40:19

25 interrogatories. I want to ask you a question 10:40:21

1 about that. So let me know if you see that in the 10:40:23  
2 pile. 10:40:24  
3 Do you have now Exhibit 2? 10:40:30  
4 MR. WOOD: Is there a specific 10:40:32  
5 interrogatory you want him to go to? 10:40:33  
6 MR. SCHWARTZ: I'll direct him to it. I 10:40:33  
7 just wanted to make sure. You do have Exhibit 2? 10:40:33  
8 THE WITNESS: Yes. 10:40:36  
9 BY MR. SCHWARTZ: 10:40:38  
10 Q. Let's see. Where is this? 10:40:43  
11 So if you look at page 3 of Exhibit 2, 10:41:17  
12 there is a response to Interrogatory No. 1. 10:41:19  
13 You let me know when you are on page 3. 10:41:22  
14 A. I am on page 3. 10:41:25  
15 Q. Okay. And at lines 15 and 16, I'll read 10:41:26  
16 it, and you can read along as I read it aloud. 10:41:29  
17 Your answer to Interrogatory 1 -- by the way, just 10:41:31  
18 for context asks for you to describe all harm you 10:41:34  
19 have suffered, if any, as a result of the false and 10:41:40  
20 defamatory accusations you identify in your 10:41:43  
21 complaint, et cetera. And the part of the answer I 10:41:47  
22 want to focus you on is on lines 15 through 16, and 10:41:47  
23 I will read it as follows: 10:41:52  
24 "Plaintiff is not seeking damages for  
25 lost wages or earning opportunities, or any other 10:41:57

1     that anyone anywhere in the world believes you are     10:59:43  
2     a child rapist or a pedophile?     10:59:47  
3             MR. WOOD: Just for clarification, are     10:59:49  
4     you asking him to include in that --     10:59:50  
5             MR. SCHWARTZ: Don't -- be very careful     10:59:53  
6     about coaching the witness.     10:59:55  
7             MR. WOOD: Do not interrupt me.     10:59:56  
8             MR. SCHWARTZ: I'm going to interrupt you     10:59:57  
9     if you coach the witness.     10:59:57  
10            MR. WOOD: Do not interrupt me.     10:59:57  
11            For point of clarification, are you     11:00:02  
12     asking him to include information he may have     11:00:04  
13     learned through Counsel as it relates to the     11:00:08  
14     employees of Mr. Musk's beliefs. That is my point     11:00:12  
15     of clarification.     11:00:16  
16            MR. SCHWARTZ: You're going to have to     11:00:18  
17     decide whether you want him to waive the     11:00:19  
18     attorney-client. Do you think there is some     11:00:19  
19     privilege issue here? I don't know. You tell me.     11:00:20  
20     Do you want to open the door to that, or not?     11:00:22  
21            MR. WOOD: I am not opening the door. I     11:00:25  
22     am just simply politely asking for clarification.     11:00:26  
23     You have this broad statement: Do you have any --     11:00:29  
24            MR. SCHWARTZ: Yeah.     11:00:37  
25            MR. WOOD: Hold on. "Do you have any     11:00:37

1 facts or any evidence that anyone anywhere in the 11:00:39  
2 world believes you are a child rapist or 11:00:42  
3 pedophile?" 11:00:44  
4 And I am simply asking you: Are you 11:00:45  
5 including the people that work for Elon Musk that 11:00:47  
6 he may have learned about their beliefs and their 11:00:51  
7 statements -- 11:00:54  
8 MR. SCHWARTZ: Yeah. 11:00:55  
9 MR. WOOD: -- and their efforts to have 11:00:55  
10 articles published about him being a pedophile. 11:00:57  
11 Are you asking him to include those people? That 11:00:59  
12 is my simple point of clarification. 11:01:02  
13 MR. SCHWARTZ: Anybody. Anywhere in the 11:01:04  
14 world. 11:01:07  
15 THE WITNESS: Could you repeat the 11:01:09  
16 question. 11:01:10  
17 BY MR. SCHWARTZ: 11:01:10  
18 Q. Yeah. I'll tell you what we'll do. 11:01:10  
19 We'll break it up. 11:01:10  
20 Putting aside anybody who either 11:01:12  
21 Elon Musk or anybody who works for Elon Musk, are 11:01:14  
22 you aware of any facts or any evidence that 11:01:17  
23 anybody, anywhere in the world, thinks you are a 11:01:20  
24 pedophile or believes what Elon Musk said about 11:01:25  
25 you? Let's do it that way. 11:01:29

|    |                                                     |          |
|----|-----------------------------------------------------|----------|
| 1  | A. No.                                              | 11:01:31 |
| 2  | Q. Do you have any evidence that any --             | 11:01:34 |
| 3  | either -- that anybody who works for Elon Musk --   | 11:01:36 |
| 4  | put aside Elon Musk. That anybody who works for     | 11:01:38 |
| 5  | Elon Musk actually believes you are a child rapist  | 11:01:42 |
| 6  | or a pedophile?                                     | 11:01:45 |
| 7  | A. From the report I have seen, which was an        | 11:01:49 |
| 8  | intrusion of my private life by an investigator,    | 11:01:55 |
| 9  | what was reported in the there intimates that I am  | 11:02:04 |
| 10 | a pedo.                                             | 11:02:11 |
| 11 | Q. And that is a document that your lawyer's        | 11:02:12 |
| 12 | asked us to produce and that we produced during     | 11:02:14 |
| 13 | discovery in this case; is that what you are        | 11:02:17 |
| 14 | referring to?                                       | 11:02:19 |
| 15 | A. Yes.                                             | 11:02:19 |
| 16 | Q. And what you are referring to is a               | 11:02:20 |
| 17 | private investigator's report to Mr. Musk on the    | 11:02:22 |
| 18 | issue of whether or not you are a pedophile; is     | 11:02:26 |
| 19 | that right?                                         | 11:02:28 |
| 20 | A. Yes.                                             | 11:02:29 |
| 21 | Q. Other than that, are you aware if --             | 11:02:29 |
| 22 | well, I've already -- I think we have clarified.    | 11:02:29 |
| 23 | So have people come up to you and said --           | 11:02:52 |
| 24 | putting aside business associates and friends, have | 11:02:55 |
| 25 | people you don't know come up to you and said       | 11:03:00 |

1 "Mr. Unsworth, you know, we support you. Right on. 11:03:02  
2 We don't believe this stuff about you that Mr. Musk 11:03:06  
3 said"? 11:03:10  
4 A. Not physically come up to me and said -- 11:03:13  
5 or reported what you have just intimated. 11:03:14  
6 Q. Have people posted on social media or 11:03:18  
7 sent you emails or any other form of electronic 11:03:20  
8 communication to you where they have said in words 11:03:23  
9 or effect "Mr. Unsworth, we don't believe what 11:03:26  
10 Mr. Musk said about you"? 11:03:29  
11 A. Sitting here today from what I recall I 11:03:34  
12 can't think of anything. 11:03:37  
13 MR. SCHWARTZ: Let's mark this, please. 11:03:38  
14 (Exhibit 9 was marked for identification.) 11:03:38  
15 BY MR. SCHWARTZ: 11:04:22  
16 Q. Mr. Unsworth, this comes from your files, 11:04:23  
17 VU 72. It is an email from someone named 11:04:23  
18 Bill Stone to you. Monday, 16 July, 2018; is that 11:04:28  
19 right? 11:04:35  
20 A. Yes. 11:04:42  
21 Q. And do you remember receiving this email? 11:04:42  
22 A. Yes. 11:04:49  
23 Q. And the substance of this email is he is 11:04:53  
24 aware of the controversy between you; the issue 11:04:55  
25 between you and Elon Musk. Is that right? 11:05:00



1 way with the cave rescue? 11:09:40

2 A. Yes. 11:09:43

3 Q. In October '18, you received the Social 11:10:01

4 Impact Award from the British Chamber of Commerce 11:10:05

5 in Thailand; is that right? 11:10:10

6 A. Yes. And I need to qualify that that 11:10:13

7 award was effectively for the whole team. 11:10:15

8 Q. So you were one of several people who 11:10:17

9 received in October 2018 the Social Impact Award 11:10:20

10 from the British Chamber of Commerce in Thailand? 11:10:23

11 A. I was the only person to receive the 11:10:27

12 award on behalf of the UK team. 11:10:30

13 Q. That's a prestigious award, isn't it? 11:10:33

14 A. It was a new award, so you can regard it 11:10:38

15 as the first time it had ever been awarded. 11:10:40

16 Q. Did you feel honored to be accepting the 11:10:44

17 award on behalf of the British team? 11:10:46

18 A. Yes. 11:10:48

19 Q. And October '18 is after Mr. Musk said 11:10:50

20 the things about you that have led you to file this 11:10:58

21 lawsuit; is that right? 11:11:01

22 A. Yes. 11:11:03

23 Q. Did anyone from the British Chamber of 11:11:10

24 Commerce Thailand tell you they believed Mr. Musk's 11:11:10

25 statements about you? 11:11:16

|    |                                                   |          |
|----|---------------------------------------------------|----------|
| 1  | A. No.                                            | 11:11:17 |
| 2  | Q. You -- and -- is it correct that after         | 11:11:20 |
| 3  | Mr. Musk said the things about you that have led  | 11:11:26 |
| 4  | you to file this lawsuit against him, the         | 11:11:29 |
| 5  | government of Her Majesty Queen Elizabeth of      | 11:11:32 |
| 6  | England awarded you the MBE honor?                | 11:11:37 |
| 7  | A. Yes, and I mentioned that in a previous        | 11:11:42 |
| 8  | answer.                                           | 11:11:45 |
| 9  | Q. MBE stands for "Member of the Most             | 11:11:46 |
| 10 | Excellent Order of the British Empire"; is that   | 11:11:48 |
| 11 | right?                                            | 11:11:52 |
| 12 | A. Yes.                                           | 11:11:52 |
| 13 | Q. Is this a prestigious honor in the United      | 11:11:54 |
| 14 | Kingdom?                                          | 11:12:00 |
| 15 | A. Yes.                                           | 11:12:01 |
| 16 | Q. Do you think the government of Her             | 11:12:02 |
| 17 | Majesty Queen Elizabeth of England would have     | 11:12:03 |
| 18 | bestowed the honor of MBE on you if she or anyone | 11:12:05 |
| 19 | else in the government believed that you were a   | 11:12:09 |
| 20 | pedophile or a child rapist?                      | 11:12:11 |
| 21 | MR. WOOD: You want him to answer what is          | 11:12:18 |
| 22 | in the mind's eye of the government?              | 11:12:20 |
| 23 | MR. SCHWARTZ: I am asking him what he             | 11:12:23 |
| 24 | thinks.                                           | 11:12:25 |
| 25 | THE WITNESS: I have no idea what the              | 11:12:25 |

1 government are thinking. 11:12:28

2 BY MR. SCHWARTZ: 11:12:29

3 Q. Now, several months after Mr. Musk's 11:12:29

4 statements about you, you were informed that you 11:12:31

5 will be receiving a Certificate of Commendation by 11:12:33

6 the Royal Humane Society in relation to the rescue; 11:12:37

7 is that right? 11:12:41

8 A. Yes. 11:12:42

9 Q. And after Mr. Musk's statements about you 11:12:43

10 that you are suing him for here, you were informed 11:12:47

11 that you will be receiving the Royal Thai Insignia 11:12:50

12 King Commander Second Class honor; is that right? 11:12:53

13 A. Yes. 11:12:59

14 Q. And have you, in fact, now received that 11:13:00

15 award? 11:13:01

16 A. No. 11:13:02

17 Q. And when is that to be awarded to you? 11:13:03

18 A. No idea. And neither has the same -- the 11:13:05

19 Royal Humane Society Certification of Commendation 11:13:07

20 has not yet been issued. 11:13:12

21 Q. Have you ever been nominated for an award 11:13:22

22 but had the nomination revoked because of 11:13:25

23 Mr. Musk's statements about you? 11:13:29

24 A. Not that I am aware. 11:13:31

25 Q. Has anyone told you that an organization 11:13:33

1 Mr. Musk, someone who works with Mr. Musk at one of 14:30:29  
2 his companies at the rescue site or during the 14:30:32  
3 rescue operations? 14:30:37

4 A. I seem to remember, but I can't recall 14:30:38  
5 the day, that one of the engineers was introduced 14:30:41  
6 to possibly myself with Martin Ellis and maybe two 14:30:45  
7 or three others. But that was early on in the 14:30:51  
8 rescue, and I cannot recall what day that was. I 14:30:53  
9 seem to recall there was a photograph somewhere of 14:30:57  
10 the SpaceX engineer, but I can't recall his name; 14:31:03  
11 can't recall what day it was. 14:31:09

12 Q. Other than meeting -- how much time by 14:31:12  
13 the way did you spend with the SpaceX engineer 14:31:16  
14 whose name you don't remember? 14:31:20

15 A. Very little. 14:31:21

16 Q. A minute? 14:31:21

17 A. Less than five minutes. 14:31:21

18 Q. Did you have any discussion with him 14:31:22  
19 about what was going on inside the cave? 14:31:24

20 A. No. 14:31:26

21 Q. Did you have any discussion with him 14:31:28  
22 about the rescue sub? 14:31:29

23 A. No. 14:31:31

24 Q. What did you talk to him about? 14:31:32

25 A. I can't recall the discussions were 14:31:34

1 about. 14:31:36

2 Q. Okay. Other than the conversation you 14:31:37

3 had with a SpaceX engineer that you just testified 14:31:39

4 to, did you have any other interaction with anyone 14:31:43

5 else working with Mr. Musk at the rescue site or 14:31:47

6 during the rescue operation? 14:31:50

7 A. No. 14:31:52

8 Q. And am I correct that you weren't in any 14:31:53

9 meetings with Mr. Musk or those working with him in 14:31:56

10 which they discussed the cave's conditions or the 14:31:58

11 rescue? 14:32:02

12 A. No. 14:32:03

13 Q. And you were not in any meetings with 14:32:05

14 Mr. Musk or those working with him when they were 14:32:07

15 working on the rescue sub, were you? 14:32:10

16 A. No. 14:32:13

17 Q. Okay. The next thing you said to the CNN 14:32:20

18 reporter was "It just had absolutely no chance of 14:32:22

19 working," and the "it" in that sentence is the 14:32:25

20 rescue submarine, correct? 14:32:29

21 A. Yes. 14:32:34

22 Q. And before you sat down for the July 13th 14:32:35

23 CNN interview, you had investigated whether the 14:32:37

24 rescue sub would work, had you not? 14:32:40

25 A. Could you rephrase -- repeat the 14:32:46

1 question, please. 14:32:48

2 Q. Sure. Before you sat down for the CNN 14:32:49

3 interview on July 13th, you had investigated 14:32:52

4 whether Mr. Musk's rescue sub would work? 14:32:56

5 A. What do you mean by "investigated"? 14:33:01

6 Q. In my question I meant you gathered 14:33:03

7 information to enable you to reach a conclusion as 14:33:05

8 to whether it would work. 14:33:08

9 Had you done that? 14:33:09

10 A. Yes. 14:33:11

11 Q. And you talked with people before you met 14:33:11

12 with CNN to get their views as to whether 14:33:13

13 Mr. Musk's rescue sub would work, correct? 14:33:18

14 A. No. 14:33:19

15 Q. Did you talk with anybody? 14:33:20

16 A. No. 14:33:21

17 Q. Did you look at videos of the rescue sub 14:33:21

18 before you met with CNN on July 13? 14:33:24

19 A. Yes. 14:33:26

20 Q. In terms of gathering information 14:33:30

21 sufficient to enable you to make a decision as to 14:33:32

22 whether the rescue sub would have worked, what 14:33:35

23 besides viewing a video did you do? 14:33:37

24 A. I just based my opinion based on what I 14:33:42

25 saw in the video compared to the conditions that 14:33:47

1       were occurring in the cave system. 14:33:56

2           Q.     And approximately how much time did you 14:34:00

3       spend gathering information about the rescue sub 14:34:02

4       and whether it would work or anything about it 14:34:04

5       before you met with CNN? 14:34:07

6           A.     Not a great deal. 14:34:09

7           Q.     How much? 14:34:11

8           A.     Just the video. 14:34:11

9           Q.     How long was the video? 14:34:13

10          A.     I can't remember how long the video was. 14:34:14

11          MR. WOOD: Do you have the video you're 14:34:16

12       talking about the submarine? 14:34:16

13          MR. SCHWARTZ: I don't. 14:34:16

14          MR. WOOD: Is this the video that 14:34:18

15       Elon Musk published on his website showing him 14:34:19

16       working on it? 14:34:22

17          MR. SCHWARTZ: Let me just ask the 14:34:24

18       questions, okay? 14:34:25

19          MR. WOOD: You're asking about a video. 14:34:26

20       For purposes of clarity, because a year from now we 14:34:26

21       may not know, or six months when the trial occurs, 14:34:27

22       what you're talking about. If you had the video, I 14:34:30

23       simply would like for it to be identified, and not 14:34:33

24       just be an "unidentified video." I think you're 14:34:35

25       talking about the one that Musk put his website or 14:34:39



1 was Twitter. 14:34:41

2 MR. SCHWARTZ: I don't. It sounds like 14:34:43

3 you know more about this than I do, honestly. 14:34:44

4 MR. WOOD: Well, I think I do, but I'm 14:34:46

5 not trying to be insulting or anything. I do think 14:34:48

6 I do know more about this, but that's irrelevant. 14:34:49

7 It doesn't matter what I know. 14:34:51

8 MR. SCHWARTZ: So why don't -- so let's 14:34:53

9 just ask questions and let me see if I have 14:34:53

10 something I can show the witness. 14:34:56

11 MR. WOOD: Okay. 14:34:58

12 MR. SCHWARTZ: So let's just keep on 14:34:58

13 going on. 14:34:58

14 THE WITNESS: Well, excuse me. Your 14:35:00

15 question was how long did I -- 14:35:00

16 MR. SCHWARTZ: Spend gathering 14:35:04

17 information. 14:35:05

18 THE WITNESS: And specifically referenced 14:35:06

19 the video. And I said "I don't know how long the 14:35:06

20 video was," or words to that effect. So if the 14:35:09

21 video is available, we can then see how long the 14:35:12

22 video lasted. 14:35:15

23 BY MR. SCHWARTZ: 14:35:16

24 Q. We can. Not the import of my question. 14:35:17

25 I'm just trying to understand what you did. So 14:35:19

1 let's move -- keep moving forward, okay? Let me 14:35:20  
2 ask you a new question. 14:35:24  
3 What prompted you after the cave rescue 14:35:26  
4 was over -- or maybe I'm wrong about that. 14:35:30  
5 The video that you watched about the 14:35:33  
6 rescue sub -- did you watch it before or after the 14:35:35  
7 cave rescue had ended? 14:35:37  
8 A. After. 14:35:39  
9 Q. What prompted you to watch it? Why were 14:35:40  
10 you -- let me ask a different question. 14:35:41  
11 Why were you interested in learning about 14:35:43  
12 Mr. Musk's rescue sub after the rescue had been 14:35:46  
13 completed successfully? 14:35:49  
14 A. Because basically this was supposed to be 14:35:51  
15 the tube that was going to rescue the children, so 14:35:55  
16 I, as an individual who was pivotal to the rescue 14:36:01  
17 operation -- I was interested in what it was all 14:36:08  
18 about. 14:36:10  
19 Q. How did you come to learn or come to the 14:36:12  
20 supposition that the tube would rescue the kids? 14:36:15  
21 MR. WOOD: Would? 14:36:24  
22 BY MR. SCHWARTZ: 14:36:26  
23 Q. Yes. Your answer was basically, this -- 14:36:27  
24 Or -- I'm sorry. Appreciate that. 14:36:32  
25 You said "Basically, this was supposed to 14:36:33

1 be the tube that was going to rescue the children." 14:36:35

2 How did you come to have a supposition 14:36:38

3 that the tube was going to rescue the children? 14:36:40

4 A. Because that is what it was being built 14:36:45

5 for. That is what it was being delivered for. 14:36:47

6 That is what it effectively put into operation for 14:36:50

7 by your client. 14:36:55

8 Q. Okay. So you thought -- what? I want to 14:36:59

9 learn more about it? 14:37:04

10 A. Yes. 14:37:06

11 Q. Was there any concern going through your 14:37:07

12 head -- strike the word "concern." 14:37:09

13 Was there any thought going through your 14:37:10

14 head during this period that Mr. Musk was 14:37:12

15 attempting to claim credit where credit was not 14:37:16

16 due? 14:37:20

17 A. No. Not at that particular time, no. 14:37:21

18 Q. At what point? Did there ever come a 14:37:23

19 point in time where you felt that way about 14:37:25

20 Mr. Musk? That is to say where you felt Mr. Musk 14:37:28

21 was attempting to claim credit for something to do 14:37:32

22 with the rescue that in your view was not due? 14:37:34

23 A. I can't recall what my feelings were at 14:37:39

24 the time. 14:37:41

25 Q. Well, just so I'm clear, though, I just 14:37:45

1 want to ask you: Was there ever a point in time 14:37:50  
2 where you have felt that Mr. Musk was trying to 14:37:53  
3 claim credit where credit was not due in relation 14:37:56  
4 to the cave rescue? 14:37:58

5 A. No. 14:38:02

6 Q. Has there ever been a point in time where 14:38:03  
7 in your mind you thought Mr. Musk's motives for 14:38:05  
8 involving himself in the cave rescue had nothing to 14:38:12  
9 do with trying to rescue the kids, but were instead 14:38:14  
10 intended for some other purpose? 14:38:18

11 A. No. 14:38:21

12 Q. Your next statement in the interview is 14:38:45  
13 "It wouldn't have made the first 50 meters into the 14:38:46  
14 cave from the dive start point." 14:38:49

15 Did you say that? 14:38:51

16 A. Yes. 14:38:52

17 Q. Okay. Where -- let's see. I'm just 14:38:53  
18 going to reach out here and show you Exhibit -- 14:38:54  
19 this is Exhibit 5. 14:39:00

20 Can you show me where on Exhibit 5 the 14:39:01  
21 dive start point was? 14:39:04

22 MR. WOOD: I have -- do you have anything 14:39:10  
23 better we could use, because -- maybe something 14:39:11  
24 closer. 14:39:12

25 MR. SCHWARTZ: Okay. What do you want to 14:39:12

1 MR. WOOD: He is asking about that one, 15:40:21  
2 and this one is going to stay here. Did you -- did 15:40:27  
3 he get No. 20? 15:40:32  
4 MR. SCHWARTZ: That's the one right here. 15:40:32  
5 MR. WOOD: He's asking you to look at 19 15:40:32  
6 and 20. It's inside that. 15:40:34  
7 THE WITNESS: I prefer the big writing. 15:40:40  
8 MR. WOOD: Oh, yeah. So do I. 15:40:42  
9 BY MR. SCHWARTZ: 15:40:52  
10 Q. So now we have the three tweets that he 15:40:53  
11 sent on Exhibit 19, and the fourth tweet of the day 15:40:58  
12 on Exhibit 20. 15:41:05  
13 Have you read them? 15:41:06  
14 A. Yes. 15:41:07  
15 Q. Taking all these tweets together from 15:41:11  
16 that day, tell me everything that is false and 15:41:14  
17 harmful to you about them. 15:41:16  
18 MR. WOOD: I'm going to object to the 15:41:19  
19 form of the question because it is compound. Maybe 15:41:20  
20 if you broke it down, like what is false, and then 15:41:23  
21 we can talk about that. 15:41:25  
22 BY MR. SCHWARTZ: 15:41:26  
23 Q. Fair enough. Tell me everything that is 15:41:27  
24 false. 15:41:27  
25 A. Okay. We take the first tweet regarding 15:41:29

1 the water level was actually very low and still not 15:41:32  
2 flowing. The "not flowing" part of that is totally 15:41:36  
3 100 percent wrong. 15:41:43

4 Q. And I apologize -- 15:41:45

5 A. No. Excuse me. 15:41:47

6 Q. No, I'll explain. I asked you the wrong 15:41:47  
7 question. I need to withdraw the question. 15:41:49  
8 So what I want to ask you is: Tell me 15:41:51  
9 everything about these tweets, about you, 15:41:55  
10 Vernon Unsworth, that is false? 15:41:58

11 A. About me? 15:42:05

12 Q. Yes. That concerns you, is about you, 15:42:07  
13 that is false. 15:42:09

14 A. There is nothing in this first tweet that 15:42:21  
15 is about me. 15:42:24

16 MR. WOOD: The first tweet is this one. 15:42:26

17 THE WITNESS: I don't understand. Sorry. 15:42:29

18 BY MR. SCHWARTZ: 15:42:30

19 Q. I'm sorry. Let me withdraw the question 15:42:31  
20 again. I didn't want to ask if I -- my question 15:42:31  
21 was about the first tweet. I misspoke. I 15:42:34  
22 apologize. 15:42:37

23 Tell me everything about you in these 15:42:37  
24 four tweets that is false. Could be in any one of 15:42:40  
25 four of them that is either about you, concerning 15:42:46

1     you, of you, in reference to you in any way?                     15:42:49

2                     MR. WOOD: Or if the stain or the gist is             15:42:54

3     about him.                                                             15:42:57

4                     MR. SCHWARTZ: Exactly.                             15:42:58

5                     MR. WOOD: I'm not sure he understands             15:42:58

6     that. And I think we set this out pretty clearly             15:43:00

7     in our complaint.                                                     15:43:03

8                     MR. SCHWARTZ: All right. Let's try it             15:43:04

9     that way. see what happens, and if we need to ask a             15:43:07

10    different question, we will.                                         15:43:10

11                    MR. WOOD: Yeah. I just think you're             15:43:11

12    moving into an area where --                                         15:43:11

13                    MR. SCHWARTZ: I understand. Let's see             15:43:14

14    what we can do.                                                     15:43:14

15                    MR. WOOD: -- it's difficult for a lay             15:43:14

16    witness to understand exactly what you are asking.             15:43:15

17    BY MR. SCHWARTZ                                                     15:43:16

18                    Q. Well, how about if I do it this way --             15:43:19

19                    A. Well, if you look at the first tweet.             15:43:20

20                    Q. Sorry. Go ahead.                                 15:43:22

21                    A. I never saw this British expat guy who             15:43:23

22    lives in Thailand (SUS) at any point in the caves.             15:43:25

23    I've given you the answer to that.                                 15:43:28

24                    Q. Can you just repeat. I'm not sure what             15:43:32

25    you are referring to when you say that.                             15:43:33



1           A.    I mentioned, and my answer was, the           15:43:36  
2    reason he didn't see me was because it was the           15:43:38  
3    early hours of the morning of the --           15:43:42

4           Q.    Ah.           15:43:44

5           A.    -- 10th of July --           15:43:44

6           Q.    Okay.           15:43:44

7           A.    -- and quite rightly I was trying to get   15:43:44  
8    some well-earned sleep after finishing day two of   15:43:49  
9    the rescue.           15:43:52

10                   So that's the reason why he never saw me.   15:43:54  
11   With regards "SUS," I regard that as "suspect." I   15:43:57  
12   don't know what he was really -- or why he was   15:44:02  
13   really referring to that -- obviously because I   15:44:04  
14   live in -- part of the year in Thailand.   15:44:07

15                   There is nothing in here, in the second   15:44:11  
16   tweet, the water level that's actually about me.   15:44:13  
17   There is nothing there that I can see relative to   15:44:16  
18   me as an individual, because all he says "If not   15:44:22  
19   true, then I challenged him to show the final   15:44:26  
20   rescue video."   15:44:29

21                   Well, that's not necessarily about me   15:44:30  
22   personally, nothing harmful about that particular   15:44:33  
23   tweet, okay?   15:44:37

24                   And then the part that is harmful to me   15:44:37  
25   is "Sorry, pedo guy."   15:44:37

1 Q. Again, I just -- counsel asked that I 15:44:58  
2 focus your attention on what is false, and that may 15:45:01  
3 be false too. You used the word "harmful." 15:45:03  
4 A. It is false. 15:45:06  
5 Q. I understand, but you used the word 15:45:06  
6 "harmful." I just want to make sure we're focusing 15:45:07  
7 at this -- in this question is: Is there anything 15:45:09  
8 in here about you that is false. And your answer 15:45:12  
9 may be the same. 15:45:15  
10 I just didn't want you to have answered a 15:45:17  
11 different question. We're focusing on falsity -- 15:45:20  
12 A. I think we're clear on the part of being 15:45:22  
13 false, not harmful; is that correct? 15:45:24  
14 Q. Tell you what. 15:45:31  
15 MR. WOOD: Why don't you just tell him -- 15:45:31  
16 THE WITNESS: There is nothing there -- 15:45:31  
17 there is nothing there -- 15:45:31  
18 MR. SCHWARTZ: I'm sorry. Only one 15:45:35  
19 person can talk at a time. 15:45:36  
20 MR. WOOD: First he's asking you is there 15:45:37  
21 anything -- and now you're looking at the last 15:45:37  
22 tweet, Vernon, first -- and it may be the same 15:45:40  
23 thing -- what is false in this tweet? 15:45:44  
24 And I am talking about one at the bottom 15:45:47  
25 of 814, and that's Exhibit 18. That's the one he's 15:45:49

1 asking you about. 15:45:53

2 MR. SCHWARTZ: Exhibit 19. 15:45:53

3 MR. WOOD: I'm sorry. 19. 15:45:55

4 THE WITNESS: False about me? 15:45:56

5 BY MR. SCHWARTZ: 15:45:58

6 Q. Yes. 15:46:01

7 A. There is nothing -- there is nothing in 15:46:01

8 there that is effectively false about me, other 15:46:02

9 than the comment "Sorry, pedo guy." 15:46:04

10 Q. And then the question that prompted all 15:46:08

11 this was: Taking all four of these tweets 15:46:11

12 together, is there anything false in them about 15:46:14

13 you, that concerns you, or attenuated to. I just 15:46:18

14 want to make sure you've told me everything. You 15:46:22

15 haven't said anything about the last tweet, and I 15:46:23

16 want to make sure you do that. 15:46:26

17 A. I was going to go on to that. 15:46:29

18 Q. Okay. 15:46:29

19 A. But there's the two things, but you 15:46:29

20 didn't let me finish with the fourth tweet. So we 15:46:30

21 got "Sorry, pedo guy," and then "Bet ya a signed 15:46:34

22 dollar that it's true." So that's harmful. 15:46:36

23 Q. You're answering harmful; we're focusing 15:46:42

24 on falsity. 15:46:46

25 A. Not false. 15:46:47

1 Q. When you say "not false," what do you 15:46:48  
2 mean? 15:46:50  
3 A. I am saying it's -- sorry. It's false. 15:46:51  
4 Q. What's false? 15:46:54  
5 A. So "Bet you a signed dollar it's true" is 15:46:55  
6 false. I'm not a pedo. 15:46:58  
7 Q. Ah, okay. So is it correct, you are 15:47:01  
8 assuming that the statement "Bet ya a signed dollar 15:47:04  
9 it's true," that "it's" is a reference to pedo guy? 15:47:09  
10 A. Yes. 15:47:13  
11 Q. Okay. So -- 15:47:13  
12 MR. WOOD: Do you have -- I'm just asking 15:47:13  
13 for purposes of clarity and context. Do you have 15:47:15  
14 the tweet that Mr. Musk was responding to when he 15:47:19  
15 made that statement about "Bet ya a signed dollar 15:47:22  
16 it's true"? 15:47:23  
17 MR. SCHWARTZ: I don't. 15:47:25  
18 MR. WOOD: I think that would help 15:47:25  
19 everybody to clearly understand what he was 15:47:26  
20 referring to. 15:47:28  
21 BY MR. SCHWARTZ: 15:47:32  
22 Q. All right. So let's take it from the top 15:47:33  
23 again. Now I want to ask about harm because of 15:47:33  
24 what your lawyer said. Let's do harm -- falsity 15:47:36  
25 separate from harm. 15:47:38

1 (Exhibit 24 was marked for 16:27:46  
2 identification.) 16:27:46  
3 BY MR. SCHWARTZ: 16:27:50  
4 Q. All right. I am going to show you a 16:28:30  
5 video of an interview with a reporter from *Time* on 16:28:32  
6 July 16, 2018. We will include the video clip with 16:28:37  
7 the thumb drive to the court reporter, and I'll ask 16:28:42  
8 that you provisionally refer to it as Exhibit 24. 16:28:43  
9 I am going to turn the computer around so you can 16:28:46  
10 watch it. Just give us one second to get that 16:28:50  
11 organized. 16:29:03  
12 So I'm going to put this forward so you 16:29:17  
13 can see this, Mr. Unsworth. I'm going to hit the 16:29:19  
14 play button, and hopefully it will be loud enough 16:29:21  
15 for you to hear. 16:29:23  
16 (Video playing.) 16:29:26  
17 (Exhibit 25 was marked for 16:29:29  
18 identification.) 16:29:29  
19 BY MR. SCHWARTZ: 16:30:01  
20 Q. All right. Did you say those things to 16:30:01  
21 those reporters in July 2018? 16:30:03  
22 A. Yes. 16:30:05  
23 Q. How did that interview come about? That 16:30:11  
24 is to say the *Time* interview that we just looked at 16:30:13  
25 a video clip of? 16:30:15

1           A.    I happened to be up at the rescue site on   16:30:17  
2   the day there was some sort of celebration going       16:30:22  
3   on, and the reporters were there at the same time,     16:30:26  
4   and they approached me.                                   16:30:32

5           Q.    When the reporters approached you, what   16:30:38  
6   you did the reporter say to you? Did the reporter     16:30:40  
7   recognize you; knew who you were?                     16:30:43

8           A.    Yes, of course.                           16:30:45

9           Q.    So what did the reporter say?           16:30:46

10          A.    I can't recall what was said.           16:30:48

11          Q.    What makes you say that the reporter --   16:30:49  
12   of course the reporter recognized you?               16:30:51

13          A.    I had just been around the rescue for     16:30:56  
14   17 days, and my face was, at that stage, very       16:30:59  
15   well-known.                                             16:31:02

16          Q.    Do you believe your face was very       16:31:03  
17   well-known to reporters?                             16:31:06

18          A.    Yes.                                       16:31:07

19          Q.    Approximately how many interviews had you   16:31:13  
20   done about the cave rescue by the time it had been     16:31:15  
21   successfully completed? In other words, there were     16:31:18  
22   some interviews that were done with you during the     16:31:20  
23   rescue; there were some after. About how many          16:31:23  
24   interviews did you do about the cave rescue?          16:31:25

25          A.    Actually, on the rescue from what I can    16:31:29

1 recall sitting here today, there was I think two 16:31:32  
2 very short interviews done -- that was during the 16:31:34  
3 rescue. That is what I can recall as I sit here 16:31:38  
4 today. 16:31:43  
5 After the rescue, and we're talking about 16:31:44  
6 before this interview, I think probably one, two, 16:31:49  
7 maybe. 16:31:56  
8 Q. Were there also reporters who talked to 16:31:59  
9 you who didn't videotape an interview with you, but 16:32:02  
10 talked with you for purposes of writing a printed 16:32:05  
11 story about the rescue? 16:32:08  
12 A. Sitting here today I can't recall. 16:32:11  
13 Q. You don't know -- I'm sorry. 16:32:13  
14 A. I can't recall that happening. 16:32:14  
15 Q. Can I have 1033, please. 16:32:22  
16 Were you interviewed by reporters from 16:33:03  
17 *The Guardian* in July 2018 about the cave rescue? 16:33:04  
18 A. I don't recall being interviewed, 16:33:10  
19 certainly by *The Guardian*. 16:33:11  
20 Q. You recognize this is a story in 16:33:13  
21 *The Guardian* about you, correct? 16:33:15  
22 A. Yes. 16:33:21  
23 Q. Have you ever met Michael Safi or 16:33:21  
24 Sam Levin? 16:33:24  
25 A. I don't recall the names. I don't recall 16:33:26

VERNON UNSWORTH

August 14, 2019

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9 I, VERNON UNSWORTH, do hereby declare under the  
10 penalty of perjury that I have read the foregoing  
11 transcript; that I have made any corrections as  
12 appear noted, in ink, initialed by me, or attached  
13 hereto; that my testimony as contained herein, as  
14 corrected, is true and correct.

15 EXECUTED this \_\_\_\_ day of \_\_\_\_\_,  
16 20\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
17 (City) (State)

18

19

20

VERNON UNSWORTH

21

22

23

24

25



## VERNON UNSWORTH

August 14, 2019

1 I, PATRICIA Y. SCHULER, a Certified  
2 Shorthand Reporter of the State of California, do  
3 hereby certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a  
8 verbatim record of the proceedings was made by me  
9 using machine shorthand which was thereafter  
10 transcribed under my direction; that the foregoing  
11 transcript is a true record of the testimony given.

12 Further, that if the foregoing pertains  
13 to the original transcript of a deposition in a  
14 Federal Case, before completion of the proceedings,  
15 review of the transcript [X] was [ ] was not  
16 requested.

17 I further certify I am neither  
18 financially interested in the action nor a relative  
19 or employee of any attorney of party to this  
20 action.

21 IN WITNESS WHEREOF, I have this date  
22 subscribed my name.

23 Dated: August 28th, 2019

24 *Patricia Y. Schuler*  
24

25 \_\_\_\_\_  
PATRICIA Y. SCHULER, CSR NO. 11949

# EXHIBIT 2

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA

3

4

5 VERNON UNSWORTH,

6 Plaintiff,

7 vs.

Case No. 2:18-cv-8048

8 ELON MUSK,

9 Defendant.

10

11 VIDEOTAPED DEPOSITION OF ELON MUSK

12 BEVERLY HILLS, CALIFORNIA

13 AUGUST 22, 2019

14

15

16

17

18

19 Reported By:  
20 PATRICIA Y. SCHULER  
CSR No. 11949

21 Job No. 45176

22

23

24

25

1 BBC. And it was just out of the blue this guy -- I 09:36:59  
2 never heard of him before -- makes this unprovoked 09:37:03  
3 attack; says those lies about me. I'm like what 09:37:05  
4 the heck is this guy doing, and then this is crazy. 09:37:12  
5 Who is this guy? 09:37:16  
6 And then I asked my team, anyone heard of 09:37:17  
7 this guy? Nope. Was he on the actual dive team 09:37:20  
8 that rescued the kids? They said, "Nope." Okay, 09:37:24  
9 this is it pretty suspicious situation. 09:37:26  
10 Q. What did you learn about Vernon Unsworth 09:37:36  
11 from the time that you first saw his name, whether 09:37:39  
12 it was on Twitter or Google Alert? What did you 09:37:42  
13 learn about Mr. Unsworth from that time until the 09:37:49  
14 15th of July when you tweeted about him? 09:37:54  
15 A. I am not sure of the exact dates here. 09:38:03  
16 Is the 15th -- is that when I referred to him as a 09:38:07  
17 sort of suspicious pedo guy, or is that a different 09:38:12  
18 date? 09:38:15  
19 Q. I believe that was on July the 15th. You 09:38:16  
20 don't recall the date? 09:38:19  
21 A. Not the specific date, no. 09:38:20  
22 Q. July the 15th. Am I right, gentleman? 09:38:22  
23 Yeah, July the 15th. 09:38:25  
24 What did you learn about Mr. Unsworth 09:38:27  
25 from the time you first saw his name, either on 09:38:32

1 Google alert or Twitter -- 09:38:36

2 A. Sure. 09:38:39

3 Q. -- and the time that you started tweeting 09:38:39

4 about him on July the 15th? 09:38:41

5 A. I literally just saw this article. I 09:38:45

6 think it was on Twitter. I think somebody had 09:38:48

7 retweeted the story or something like that. But it 09:38:51

8 might have been a Google newsletter; I am not sure. 09:38:55

9 But I did not really know much of anything of this 09:39:00

10 guy except that he had gone on TV with a major news 09:39:05

11 organization, and had been -- had attacked me for 09:39:13

12 no reason, unprovoked, was incredibly rude, and you 09:39:16

13 know, to be totally frank, looked sort of like a 09:39:24

14 pedo guy, you know. 09:39:27

15 And then I was like -- googled him, oh, 09:39:30

16 he was like, lives in Thailand. Okay, that's 09:39:34

17 pretty suspicious. English expat, doesn't seem to 09:39:35

18 be -- have been on the dive team, in a very dodgy 09:39:42

19 part of the world. 09:39:46

20 Q. What type of the world? 09:39:47

21 A. Dodgy. 09:39:50

22 Q. Anything else? Sorry I interrupted. 09:39:51

23 A. No. And so it's like, okay, some guy 09:39:56

24 sort of attacks me and insults me, I -- you know, I 09:40:00

25 was upset, and I insulted him back. 09:40:08

1 Q. So other than knowing that he was 09:40:12  
2 connected with the cave rescue -- 09:40:20  
3 A. I did not know that he was connected with 09:40:24  
4 the cave rescue. 09:40:26  
5 Q. Oh, you did not know that he was in any 09:40:28  
6 way present working with the other volunteers and 09:40:29  
7 individuals -- 09:40:33  
8 A. No. 09:40:33  
9 Q. -- who were trying to rescue the kids? 09:40:33  
10 A. No. At the time, I thought he was 09:40:36  
11 unconnected and just some random person who lived 09:40:37  
12 in Thailand. 09:40:39  
13 Q. I see. 09:40:41  
14 And so if I hear you correctly, well, let 09:40:42  
15 me just ask you. You said he looked -- did you 09:40:47  
16 watch the video -- 09:40:49  
17 A. Yes. 09:40:50  
18 Q. -- interview that he gave? 09:40:50  
19 A. Yes. 09:40:52  
20 Q. It was on CNN International? 09:40:53  
21 A. Okay, CNN. 09:40:54  
22 Q. Does that ring a bell? 09:40:56  
23 A. It was some major news network. 09:40:57  
24 Q. When did you watch the video? 09:41:00  
25 A. It was shortly before the tweet. 09:41:05

1 Q. Before the tweet on the 15th? 09:41:07

2 A. Yeah. I think just perhaps like -- 09:41:08

3 really shortly before -- it was like it might have 09:41:14

4 been less than an hour or a few hours before my 09:41:18

5 tweet. 09:41:21

6 Q. And when was the last time you watched 09:41:24

7 the video? 09:41:26

8 A. Probably several months ago; a year ago. 09:41:30

9 Q. Would that have been after your tweet of 09:41:33

10 the 15th of July? 09:41:36

11 A. I think I watched it maybe twice, yes. 09:41:38

12 Q. So you think you watched it once, shortly 09:41:40

13 before you did the July 15 tweets, and then 09:41:43

14 sometime thereafter you watched it again? 09:41:45

15 A. I think so. 09:41:50

16 Q. And when did you form the impression that 09:41:50

17 Mr. Unsworth looked like a pedo guy? Was that the 09:41:54

18 first time you watched it, or was it the second 09:41:58

19 time you watched it? 09:41:59

20 A. It was the first time. 09:42:00

21 Q. What does a pedo guy look like? 09:42:00

22 A. Old angry white guy living in Thailand. 09:42:04

23 Q. So any old angry guy living in Thailand 09:42:08

24 looks to you like a pedo guy? 09:42:12

25 A. It's a sort of a look. I don't know, 09:42:16

1     yeah. And why is he talking about shoving a                   09:42:19  
2     submarine up my butt. That's pretty weird and rude       09:42:26  
3     and uncalled for.                                               09:42:29  
4                 And why is he living in Thailand with no       09:42:30  
5     apparent job or anything? Why is he, you know --       09:42:34  
6     at the time I didn't -- I thought he was                   09:42:39  
7     unconnected with the cave rescue and simply just       09:42:41  
8     jumping in to claim credit and talk to the press       09:42:46  
9     and whatever.                                               09:42:49  
10                Q. I want to make sure I've covered your       09:42:50  
11     interpretation of his looks.                               09:42:53  
12                MR. WOOD: Now, y'all can't be -- let's       09:42:56  
13     don't be passing notes back and forth, please.       09:42:57  
14                MR. SPIRO: You were doing this during       09:42:59  
15     Mr. Unsworth's deposition.                               09:42:59  
16                MR. WOOD: No, I was not. No, I was not.       09:43:01  
17                MR. SPIRO: Of course you were. I saw       09:43:02  
18     you doing it. And it will be on the videotape.       09:43:03  
19                MR. WOOD: I did not -- let me tell you       09:43:06  
20     this --                                                       09:43:06  
21                MR. SPIRO: You want to take a break so I       09:43:06  
22     can confer with him for a second? There is no       09:43:07  
23     question pending.                                           09:43:09  
24                MR. WOOD: No, I don't want writing           09:43:10  
25     statements or something to the witness and showing       09:43:12



1           A.    Sort of -- I don't know.   Engaging in           09:51:22  
2   activity that would be -- he couldn't do here, I           09:51:29  
3   assume, because it's a far way to go.           09:51:34

4           Q.    What is the activity that you are           09:51:36  
5   referring that he could do in Thailand that you           09:51:38  
6   couldn't do here?   I guess "here," meaning the           09:51:40  
7   United States?           09:51:43

8           A.    Well, in his case, which is not to say           09:51:43  
9   all cases, he was, you know, engaged in pedophilia           09:51:50  
10   or something.           09:51:55

11          Q.    And how did you define "pedophilia"?   In           09:51:57  
12   your mind's eye what does that mean?           09:52:00

13          A.    I believe the definition would be           09:52:09  
14   sleeping with people below an age -- below the age           09:52:12  
15   of consent in the United States, essentially.           09:52:14

16          Q.    Having sexual relations, physical           09:52:16  
17   relations with a child under the age of consent?           09:52:20

18          A.    In the U.S., yes.           09:52:24

19          Q.    That would be a pedophile in your mind?           09:52:25

20          A.    Yes.           09:52:28

21          Q.    Anything else when you think of a           09:52:29  
22   pedophile that you think of, other than a person           09:52:30  
23   that you believe or know has been having sex           09:52:34  
24   physically with children under the age of consent?           09:52:37

25          A.    I believe there is a standard definition           09:52:45

1 of pedophile. 09:52:47

2 Q. I just want to make sure I've got yours. 09:52:48

3 Anything else that you think of when you use the 09:52:50

4 phrase "pedophile," other than an individual 09:52:52

5 involved in physical sexual activity with a child 09:52:55

6 under the age of consent? 09:52:59

7 A. I believe that is an accurate definition 09:53:02

8 of a pedophile, yes. 09:53:05

9 Q. Is that your definition? The one that 09:53:06

10 you accept as the definition? 09:53:08

11 A. Pedophile, yes. 09:53:11

12 Q. Anything else that you would add to that 09:53:12

13 definition from your perspective when you say 09:53:14

14 someone is or you believe they are a pedophile? 09:53:16

15 A. Well, I mean, they wouldn't necessarily 09:53:19

16 have had to had relations with underaged men or 09:53:22

17 women or boys or girls. They could simply -- they 09:53:26

18 could have pornography, or they could have simply 09:53:29

19 the desire. That -- "pedophile" simply means lover 09:53:32

20 of children, I guess, or something like that. 09:53:39

21 Q. Minor children? 09:53:42

22 A. Below the age of consent. 09:53:44

23 Q. The line for you, whether it's thinking 09:53:47

24 about them or watching something on a film or the 09:53:50

25 internet, the line that you draw is that these are 09:53:54

1 thoughts or activities that are related to sexual 09:54:03  
2 acts or thoughts -- 09:54:08  
3 A. Or thoughts. 09:54:11  
4 Q. -- or desires -- 09:54:11  
5 A. Yes. 09:54:13  
6 Q. -- with respect to a minor child, that is 09:54:13  
7 to say a child under the age of consent, true? 09:54:17  
8 A. That is true. 09:54:21  
9 Q. So we've got Jared, the sub guy. What 09:54:25  
10 did you call him? Jared? 09:54:33  
11 A. The Subway. 09:54:34  
12 Q. Subway guy. That all came out publicly, 09:54:36  
13 didn't it? 09:54:38  
14 A. It did, yes. 09:54:38  
15 Q. So other than Jared the Subway guy, do 09:54:39  
16 you know any other person that you would classify 09:54:42  
17 as a pedophile because of visits to Thailand? 09:54:48  
18 A. Gary Glitter. 09:54:57  
19 Q. And who is Gary Glitter? 09:54:59  
20 A. I believe he is an old English rock star. 09:55:01  
21 I am not sure if he is English or not. I think he 09:55:05  
22 is. 09:55:09  
23 Q. What did he do? 09:55:10  
24 A. He went to Thailand from England to have 09:55:10  
25 sex with underage kids. 09:55:14

1 And has been talked about a lot in the media. 09:56:35

2 And then this litigation is in addition 09:56:38

3 to that, but I think even without this litigation 09:56:40

4 he probably would be regarded as, you know, famous 09:56:42

5 in that regard. 09:56:44

6 Q. I mean, you don't have any problems with 09:56:48

7 Mr. Unsworth giving presentations or talks about 09:56:50

8 the rescue, do you? 09:56:53

9 A. No. 09:56:55

10 Q. And it didn't upset you when he received 09:56:55

11 the MBE from the royal family, did it? 09:56:58

12 A. I wasn't aware that he got one. What is 09:57:03

13 that? 09:57:06

14 Q. MBE. 09:57:07

15 A. I don't know what that is. 09:57:08

16 Q. Have you ever been to Thailand, other 09:57:10

17 than your trip there -- on I believe the 9th of 09:57:11

18 July, and maybe left I think the 10th of July -- 09:57:15

19 A. No. 09:57:18

20 Q. -- of 2018? 09:57:18

21 A. No. 09:57:19

22 Q. Never been to Thailand? 09:57:20

23 A. I don't recall being -- no. I believe 09:57:23

24 I've not been to Thailand apart from that one trip. 09:57:25

25 Q. Do you know how many times -- strike 09:57:31

1       that. 09:57:34

2               Go ahead. You want to add something. I 09:57:37

3       don't want to stop you. 09:57:38

4       A. Yeah. Just I did just sort of a Google 09:57:40

5       search on Chiang Rai and this article came up from 09:57:51

6       the *Straits Times* about -- for a Singapore - one 09:57:52

7       newspaper about how Chiang Rai was essentially the 09:57:58

8       capital of sex trafficking in the world. That was 09:58:02

9       also a data point. 09:58:08

10       Q. Anything else? 09:58:10

11       A. I was -- 09:58:10

12       Q. I was asking about your trips to 09:58:10

13       Thailand. You said you have never been except for 09:58:13

14       one time when you took the tube over. 09:58:15

15               And then you started telling me that you 09:58:19

16       had done a Google search about Chiang Rai? 09:58:19

17       A. Yes -- 09:58:23

18       Q. You did not go to Chiang Rai? 09:58:24

19       A. You asked me everything that I could 09:58:27

20       recall about this. And obviously, you know, the 09:58:28

21       human memory is fallible. So this is one extra 09:58:29

22       thing that I remember was just googling Chiang Rai 09:58:33

23       and reading the *Straits Times* article about how 09:58:37

24       Chiang Rai, which is where Mr. Unsworth is from, or 09:58:40

25       was still living, or near there, and how it being a 09:58:44

1 child sex trafficking capital of the world. 09:58:49

2 Q. When did you do that research? 09:58:51

3 A. I would not call it research. It was a 09:58:54

4 google -- 09:58:54

5 Q. So when do you the search? 09:58:55

6 A. It was shortly before the tweet. I typed 09:58:57

7 in his name in Google and his name came up -- not 09:58:59

8 his name. I typed in Chiang Rai I should say. 09:59:04

9 Q. Why Chiang Rai? 09:59:08

10 A. That is where the caves were. 09:59:09

11 Q. Not anything related to Mr. Unsworth? 09:59:12

12 A. No. Just -- 09:59:16

13 Q. Just the caves' location being at or near 09:59:17

14 Chiang Rai? 09:59:20

15 A. Yes. 09:59:20

16 Q. How many times have you done any cave 09:59:22

17 exploration? 09:59:25

18 A. When you say cave exploration, do you 09:59:32

19 mean -- I have not engaged in new caves, anything 09:59:34

20 like that. I've certainly walked through caves a 09:59:39

21 few times in my life. 09:59:41

22 Q. Where? 09:59:43

23 A. South Africa. Some caves in Canada and 09:59:44

24 the U.S. I would not say I spent any significant 09:59:51

25 time in caves. 09:59:54

1 Q. You don't do any type of cave 09:59:55  
2 exploration? 09:59:57  
3 A. No. I don't plot that as -- not anymore 09:59:59  
4 than I think most people. 10:00:04  
5 Q. I just wondered if maybe there might be 10:00:05  
6 some out-of-the-ordinary emphasis or knowledge 10:00:08  
7 about caves, because I know you've got The Boring 10:00:13  
8 Company, and y'all are boring tunnels underground. 10:00:15  
9 I just wondered if it might be anything that 10:00:18  
10 interested you in the past, that is to go and visit 10:00:20  
11 caves and explore them. 10:00:23  
12 A. Not especially, no. I mean, it's I 10:00:28  
13 wouldn't say I am particularly fond of caves. 10:00:35  
14 Q. So you're not? 10:00:40  
15 A. I am not. 10:00:41  
16 Q. Claustrophobic? 10:00:42  
17 A. No. 10:00:44  
18 Q. What is it about caves that you are not 10:00:44  
19 particularly fond of? 10:00:46  
20 A. No, I just mean I -- I'm not -- mean that 10:00:48  
21 literally. 10:00:50  
22 Q. Doesn't interest you? 10:00:51  
23 A. Neither here nor there. 10:00:53  
24 Q. You don't tout or claim any experience in 10:00:54  
25 cave exploration or cave mapping, do you? 10:00:57

1 enough information for you to refer to Mr. Unsworth 10:07:16  
2 as a pedo guy, or did you need the information that 10:07:21  
3 you got when you saw him on the interview and 10:07:26  
4 surmised that he looked like a pedo guy? 10:07:30  
5 MR. SPIRO: If can you answer that. If 10:07:33  
6 you understand the question. 10:07:34  
7 THE WITNESS: I'm not sure I -- let me be 10:07:37  
8 clear. I had never seen this guy before or heard 10:07:38  
9 of him before until I saw this interview on CNN. 10:07:41  
10 BY MR. WOOD: 10:07:45  
11 Q. And you said he looked like a pedo guy? 10:07:45  
12 A. Yeah, he looked like a pedo. 10:07:48  
13 Q. Did you need to see the interview to 10:07:51  
14 reference him as a pedo guy? Was that what kind of 10:07:53  
15 tipped the scales, or was it enough that he had 10:07:55  
16 simply lived in UK and apparently started spending 10:07:57  
17 time in Thailand? 10:08:01  
18 MR. SPIRO: Yeah. I'm going to object 10:08:02  
19 just because of the timing sequence. He said that 10:08:02  
20 he saw the interview first. He didn't start 10:08:03  
21 googling him randomly first. 10:08:05  
22 MR. WOOD: I didn't mean to suggest -- 10:08:06  
23 MR. SPIRO: Yeah. That's why -- it can 10:08:09  
24 be confusing. 10:08:09  
25 THE WITNESS: Right. 10:08:11



1 BY MR. WOOD: 10:08:11

2 Q. So you saw him first? 10:08:11

3 A. I saw his interview. And it's like, 10:08:12

4 well, who the hell is this guy, and what the hell 10:08:16

5 is he doing insulting me, insulting everything my 10:08:18

6 team did, the hard work everyone put in to try to 10:08:22

7 help these kids. 10:08:26

8 We tried hard to be helpful and do the 10:08:27

9 right thing, and this guy is just unprovoked 10:08:31

10 attacking us for no reason, being rude as hell, and 10:08:32

11 looking like a huge creep. 10:08:35

12 Q. I am just trying to figure out how much 10:08:37

13 of his looks on the interview influenced your 10:08:38

14 thoughts that he was a pedo guy or -- 10:08:41

15 A. He just looked creepy, essentially. 10:08:46

16 Q. So if you look creepy you think of 10:08:48

17 pedophilia? 10:08:52

18 A. No. I think if you look creepy and are 10:08:53

19 in Thailand that you look like a pedo guy. It's 10:08:55

20 just a bad look. 10:08:59

21 Q. But you did not tweet that he looked like 10:09:00

22 a pedo guy, did you? You called him a pedo guy, 10:09:02

23 right? 10:09:05

24 A. Pedo guy is just kind of a common insult. 10:09:06

25 Q. Common insult? 10:09:10

|    |                                                    |          |
|----|----------------------------------------------------|----------|
| 1  | A. Yes. Especially where I grew up.                | 10:09:11 |
| 2  | Q. Intending to say you're a pedophile?            | 10:09:13 |
| 3  | A. Not really.                                     | 10:09:15 |
| 4  | Q. What is it intended to convey?                  | 10:09:16 |
| 5  | A. It just basically means are you a creepy        | 10:09:18 |
| 6  | old man, which I believe actually he did seem like | 10:09:21 |
| 7  | a creepy old man to me.                            | 10:09:23 |
| 8  | Q. And how many people have you used the           | 10:09:25 |
| 9  | insult pedo guy against?                           | 10:09:27 |
| 10 | A. Growing up in South Africa, it was a            | 10:09:34 |
| 11 | common insult. Any old creepy guy would be         | 10:09:36 |
| 12 | referred to pedo guy. It was pretty normal.        | 10:09:41 |
| 13 | Q. You said growing up in South Africa it          | 10:09:43 |
| 14 | was an insult. Is that talking about, you know, in | 10:09:44 |
| 15 | your youth? Y'all used to call people pedo guys?   | 10:09:44 |
| 16 | A. Yeah. It was like, oh, creepy old man;          | 10:09:49 |
| 17 | pedo guy.                                          | 10:09:52 |
| 18 | Q. I'm more talking about as an adult any          | 10:09:53 |
| 19 | other times that you have described someone as a   | 10:09:54 |
| 20 | pedo guy, not from your youth in South Africa.     | 10:09:58 |
| 21 | A. Actually, I've not used those words             | 10:10:09 |
| 22 | publicly.                                          | 10:10:11 |
| 23 | Q. Have you used them in private?                  | 10:10:11 |
| 24 | A. Yes, in a few cases.                            | 10:10:14 |
| 25 | Q. Against whom?                                   | 10:10:16 |

1           So although he was not on the dive team           10:27:43  
2   and did not put his life at risk, he did play a           10:27:47  
3   role that was important in finding the kids. Yes.       10:27:50  
4           Let's see. Then I think at some point I       10:28:03  
5   got some-- sort of what seemed like a legal           10:28:09  
6   shakedown letter from you, I think it was,           10:28:14  
7   demanding money, you know, demanding money or there   10:28:18  
8   would be a trial or a case or something like that.       10:28:24  
9   I was like, okay, instruct me because this guy's       10:28:28  
10   motives don't -- are not good.                       10:28:31  
11         Q. Whose motives? Mr. Unsworth's or mine?       10:28:36  
12         A. Yours and Mr. Unsworth's.                   10:28:37  
13         Q. Gotcha.                                       10:28:41  
14         A. Here's some trial lawyer trying to make       10:28:44  
15   money for bad reasons, and you know, if -- why try     10:28:48  
16   to shake me down for money if the situation is           10:28:57  
17   legitimate? And then Jared and my -- currently       10:29:01  
18   office manager, mentioned that there was some       10:29:11  
19   investigator who he said he had information about     10:29:13  
20   Mr. Unsworth. I said, okay, well, if I am           10:29:20  
21   getting -- if somebody is it trying to shake me       10:29:22  
22   down here, we should try to get to the bottom of       10:29:25  
23   this and see what is going on.                       10:29:27  
24           So I said, "Okay, Jared, let's take that       10:29:28  
25   guy up on his offer and see what he finds out."       10:29:34

1 And you know, are these -- you know, is he up to no 10:29:41

2 good there, or is he there for legitimate reasons. 10:29:44

3 Q. I'm sorry. 10:29:49

4 A. Is Unsworth up to no good there, or is he 10:29:49

5 there for legitimate reasons. 10:29:55

6 Q. There for -- 10:29:59

7 A. There in Thailand or in Chiang Rai. 10:29:59

8 Q. Okay. 10:30:01

9 A. Which is an odd place to be. 10:30:01

10 So Jared had this investigator move 10:30:06

11 forward. Jared, I think, thought this guy was 10:30:11

12 legitimate, and Jared told me that, you know, the 10:30:15

13 investigator was saying that Unsworth had been up 10:30:24

14 to all sorts of bad things in Thailand, and lived 10:30:27

15 in places that were equivalent to like a red-light 10:30:32

16 district or something like that. 10:30:36

17 And told me -- these things subsequently 10:30:38

18 turned out not to be correct, but these were what 10:30:42

19 were told to me by Jared, who was told to us by 10:30:45

20 this investigator. 10:30:49

21 And Jared said that this investigator is 10:30:49

22 saying this guy had like a 12-year-old bride or 10:30:54

23 something like that, and that he lived in Pattaya 10:30:58

24 Beach in a hotel noted for underage sex tourism. 10:31:03

25 These were just things that were related to me -- 10:31:09

1 or that were relayed to me by Jared. 10:31:13

2 And I was like, wow, this is sounding 10:31:14

3 pretty bad, you know, maybe, you know, this sort of 10:31:17

4 offhand insult that I had done in kind -- in 10:31:24

5 response to his offhand insult -- maybe there's 10:31:29

6 actually some merit to this. We should, you know, 10:31:30

7 try to find out more and see if this is a serious 10:31:33

8 matter or not. 10:31:39

9 And then for some reason some guy at 10:31:40

10 BuzzFeed reached out to me about this. I am not 10:31:45

11 sure why he reached out to me. But he emailed me. 10:31:49

12 And I was like, well, what if this is a real 10:31:53

13 situation? What if what we have here is another 10:31:59

14 Jeffrey Epstein. We should, you know -- I have 10:32:02

15 this -- I am told this information. I don't know 10:32:06

16 if it is true. But what if we have another 10:32:09

17 Jeffrey Epstein on our hands? And what if he uses 10:32:11

18 whatever celebrity he gains from this cave rescue 10:32:15

19 to shield his bad deeds? This would be terrible. 10:32:20

20 And so this was like, wow, somebody 10:32:23

21 should really look into this and just find out what 10:32:27

22 is the real situation here. When I said 10:32:30

23 "pedo guy," I didn't mean that he was literally a 10:32:35

24 pedophile; it was just an insult. But after 10:32:38

25 getting this information from this investigator 10:32:41

1 through Jared, I was like, well, maybe he is 10:32:43  
2 actually a pedophile. Is this possible? 10:32:47  
3 And so when this BuzzFeed guy says "Off 10:32:49  
4 the record," meaning this is not for any 10:32:54  
5 publication or any further -- this is told in 10:32:57  
6 confidence, you should go and look into it. You 10:33:00  
7 know, and so the BuzzFeed guy broke journalistic 10:33:04  
8 ethics and published an email that was never meant 10:33:13  
9 to be published. I just wanted them to just make 10:33:17  
10 sure this guy is not actually up to very bad 10:33:21  
11 things. 10:33:25  
12 So please go -- this is what journalists 10:33:25  
13 are supposed to go do is look into these things, 10:33:29  
14 try to find out if it is real, and if is we put a 10:33:33  
15 stop to it. 10:33:39  
16 Q. So you actually had the thought at the 10:33:40  
17 time back in August of 2018, this guy might be like 10:33:43  
18 another Jeffrey Epstein? 10:33:50  
19 Is that what you told me? 10:33:50  
20 A. Is that the BuzzFeed correspondence date? 10:33:53  
21 I'm not sure of -- this is a year ago, so please if 10:33:57  
22 you could -- if I could trouble you to refresh me 10:33:59  
23 as to what you mean by that date. 10:34:01  
24 Q. Well, let me see. 10:34:03  
25 MR. WOOD: This will be 36. I had one 10:34:03

1 marked earlier as 35, but I'll come back to that. 10:34:13  
2 (Exhibit 36 was marked for 10:34:27  
3 identification.) 10:34:27  
4 BY MR. WOOD: 10:34:28  
5 Q. I'm going to hand you, Mr. Musk, what has 10:34:29  
6 been marked for purposes of identification to your 10:34:30  
7 deposition as Exhibit 36. And you may feel free to 10:34:35  
8 take the time to review that document. 10:34:40  
9 A. Sure. 10:34:42  
10 Q. But for purposes of my question, I'm just 10:34:43  
11 trying to answer your question about the timeline. 10:34:45  
12 A. Thank you. If you could allow me to take 10:34:50  
13 a moment to review it. 10:34:54  
14 Q. If this helps. Yes. 10:34:57  
15 Have you had a chance to review Exhibit 10:35:00  
16 No. 36? 10:35:59  
17 A. I did. 10:36:00  
18 Q. Have you seen it before? 10:36:01  
19 A. No. 10:36:03  
20 Q. You see that the email correspondence and 10:36:03  
21 the nondisclosure agreement are dated August 15th 10:36:10  
22 of 2018? 10:36:15  
23 A. Yes. 10:36:16  
24 Q. Does that refresh your recollection as to 10:36:17  
25 when you would have asked Jared Birchall to reach 10:36:21

1 Q. Did you think when he said it was just a 11:39:09  
2 PR stunt that that was an attack on you, Elon Musk? 11:39:11  
3 A. Attack on me and my team and everyone who 11:39:16  
4 tried to be helpful. 11:39:21  
5 Q. So the insult part was directed, you 11:39:23  
6 felt, toward you, and that that was the "stick it 11:39:26  
7 where it hurts"? 11:39:27  
8 A. Yes. 11:39:29  
9 Q. Talking about your tube. 11:39:30  
10 A. That was directed at me, yes. 11:39:32  
11 Q. Do you know what the idiom means when you 11:39:32  
12 tell somebody to "stick it where the sun doesn't 11:39:37  
13 shine" or "stick it where it hurts" or "stick it up 11:39:40  
14 your ass"? 11:39:41  
15 Do you know what that generally is meant 11:39:41  
16 to convey? Figuratively, I guess I should say? 11:39:44  
17 A. I think it's especially an idiomatic 11:39:55  
18 expression for bullshit something. 11:39:56  
19 Q. Bullshit? 11:39:59  
20 A. Yeah. 11:40:00  
21 Q. He was calling bullshit on your tube? 11:40:00  
22 A. Yeah. 11:40:03  
23 Q. And you took that as a personal attack? 11:40:03  
24 A. Of course. And an attack on my team as 11:40:07  
25 well. 11:40:10



1 Q. Right. How many members of your team are 11:40:11  
2 presently working on the minisub? 11:40:14  
3 MR. SPIRO: Presently? 11:40:17  
4 MR. WOOD: Presently. 11:40:17  
5 MR. SPIRO: Today you mean? 11:40:17  
6 THE WITNESS: Why on earth would they be 11:40:17  
7 working on it now? 11:40:17  
8 MR. WOOD: Let's start with today. 11:40:17  
9 MR. SPIRO: I Just want to make sure I 11:40:21  
10 understand the question. 11:40:22  
11 MR. WOOD: No, no, no. You understood it 11:40:24  
12 exactly. 11:40:25  
13 THE WITNESS: Why on earth would they be 11:40:26  
14 working on this now? Of course not. 11:40:26  
15 BY MR. WOOD: 11:40:30  
16 Q. When did they last -- 11:40:30  
17 A. The minisub was made -- the Thai Navy 11:40:33  
18 thought it was great. They saw that they could 11:40:39  
19 possibly use it in the future, and so it is 11:40:41  
20 currently owned by the Thai Navy. 11:40:46  
21 Q. Right. I got that. You left it there. 11:40:49  
22 A. Yeah. 11:40:50  
23 Q. Did you bring the inflatable one back? 11:40:50  
24 A. I'm not sure. We may have left that 11:40:53  
25 there or -- I'm not sure. 11:40:56

1 Q. So all I -- and I was precise about 11:40:58  
2 today. But let's talk about since your guys left 11:40:59  
3 there -- or girls. How many members of your team 11:41:03  
4 were there when you arrived? They had gone out 11:41:06  
5 there a couple days earlier? 11:41:07  
6 A. Yeah, there were five to ten people. I'm 11:41:09  
7 not sure how many -- I got there very late at 11:41:14  
8 night, so I don't know how many people were there 11:41:17  
9 exactly, but there were five to ten, I think. 11:41:19  
10 Q. And you left very early the next morning? 11:41:20  
11 A. Yes. 11:41:23  
12 Q. Those folks, however many it was -- they 11:41:26  
13 pulled out after the kids and the coach were 11:41:27  
14 successfully rescued -- 11:41:29  
15 A. That's right. 11:41:31  
16 Q. -- without the use of the tube. They 11:41:31  
17 came home? 11:41:33  
18 A. Yes. 11:41:35  
19 Q. My question is: Since the time that they 11:41:37  
20 returned to their regular task at their companies, 11:41:39  
21 your companies, has there been any work done on 11:41:43  
22 trying to further test, refine, or develop this 11:41:49  
23 minisub in the event of a future rescue that might 11:41:58  
24 be underwater? Have you done anything else on the 11:42:04  
25 tube at all? 11:42:08

1 sir? 11:59:13

2 A. I think Rick Stanton may have said some 11:59:14

3 additional testing would be needed. 11:59:16

4 (Exhibit 40 was marked for 11:59:19

5 identification.) 11:59:19

6 BY MR. WOOD: 11:59:30

7 Q. Let me hand you -- is this 40? 11:59:31

8 You see Exhibit 40 that's been marked for 11:59:33

9 purposes of identification as such? 11:59:44

10 A. Sure. 11:59:46

11 Q. Are you familiar with that document? 11:59:47

12 A. Yes. 11:59:48

13 Q. That's a tweet that you posted on 11:59:50

14 July 15th at 11:11 a.m.? 11:59:51

15 A. Yes. 12:00:01

16 Q. Your words? 12:00:02

17 A. Yes. 12:00:03

18 Q. Anybody help you write that tweet? 12:00:04

19 A. No. 12:00:06

20 Q. Anybody review that tweet before you 12:00:07

21 published it? 12:00:09

22 A. No. 12:00:11

23 Q. "Betcha a signed dollar it's true." 12:00:11

24 Have I read it correctly? 12:00:15

25 A. Yes. 12:00:17

1 Q. What was "it's"? What was the "it" you 12:00:18  
2 were referring to when you said "it's true"? 12:00:24  
3 "Betcha a signed dollar it's true"? 12:00:26  
4 A. Oh, that Unsworth was a creepy pedo guy. 12:00:32  
5 Q. That he was a pedophile? 12:00:39  
6 A. I mean, obviously this is not a 12:00:40  
7 high-stakes bet. 12:00:41  
8 Q. I'm not suggesting it's a high-stakes 12:00:43  
9 bet. I'm just simply trying to find out: You say 12:00:45  
10 on Twitter "Betcha a signed dollar it is true." 12:00:47  
11 Right? 12:00:52  
12 A. Yeah. Essentially I am saying that this 12:00:54  
13 is -- who knows what the deal is, but you know, a 12:00:57  
14 dollar if it's true; I'll pay you, you pay me, 12:01:02  
15 whatever. 12:01:05  
16 Q. The "it" that you were referring to is 12:01:06  
17 the idea that Mr. Unsworth was a pedophile? 12:01:07  
18 MR. SPIRO: Pedo guy. 12:01:14  
19 MR. WOOD: You can ask the questions when 12:01:14  
20 you want to. That's not my question. 12:01:14  
21 THE WITNESS: My point was that is he 12:01:16  
22 some pedo guy, whatever. Just a creepy old man. 12:01:18  
23 Bet you a dollar it's true. Obviously I'm not 12:01:22  
24 certain about this, and nor is it a high-stakes 12:01:26  
25 thing. It's just suspicious. 12:01:26

1 BY MR. WOOD: 12:01:29

2 Q. Why would you even say that? 12:01:29

3 A. It was a flippant comment. 12:01:30

4 Q. I thought you were trying to better 12:01:33

5 humanity. Why are you sitting here saying on 12:01:35

6 Twitter "Betcha a signed dollar it's true"? 12:01:36

7 Don't you think people would have come 12:01:38

8 away from that tweet believing that you were 12:01:41

9 conveying the idea that it was true that 12:01:43

10 Mr. Unsworth was a pedo guy? 12:01:48

11 A. No. Because I would have said "It's 12:01:50

12 true," as opposed to "It's suspicious." 12:01:51

13 Q. You said it's true. You didn't -- 12:01:55

14 A. No, I didn't. 12:01:57

15 Q. -- say it's suspicious. 12:01:58

16 "Betcha a signed dollar it is true." 12:01:58

17 What do you see there? 12:02:01

18 A. That is why it is some low-stakes bet. 12:02:02

19 This guy seems suspicious; that's all. It's 12:02:06

20 obviously not a high-stakes bet, nor does a bet 12:02:11

21 convey certainty. A bet conveys maybe this is 12:02:15

22 true; maybe it's not. 12:02:17

23 Q. Have you looked up the urban dictionary 12:02:18

24 or any type of dictionary for what that phrase 12:02:20

25 means "Betcha a signed dollar it's true" or "Bet 12:02:24

|    |                                                     |          |
|----|-----------------------------------------------------|----------|
| 1  | your bottom dollar it's true"?                      | 12:02:26 |
| 2  | A. I didn't say bottom dollar. "Bottom              | 12:02:28 |
| 3  | dollar" means all your money, but "bet you a        | 12:02:31 |
| 4  | dollar" is nothing, basically.                      | 12:02:35 |
| 5  | Q. Why a signed dollar? It's going to have          | 12:02:36 |
| 6  | more value with Elon Musk's signature on it?        | 12:02:39 |
| 7  | A. Yeah, I guess.                                   | 12:02:44 |
| 8  | Q. Is what you were conveying? Signed by            | 12:02:44 |
| 9  | me? I betcha a signed dollar it's true?             | 12:02:47 |
| 10 | A. Yeah, I mean, obviously this is a case           | 12:02:50 |
| 11 | where I would be -- yeah, maybe it's true; maybe    | 12:02:51 |
| 12 | it's not. It's pretty suspicious.                   | 12:02:52 |
| 13 | Q. You didn't say maybe it's true; maybe            | 12:02:54 |
| 14 | it's not, did you?                                  | 12:02:56 |
| 15 | A. That is what a bet is.                           | 12:02:57 |
| 16 | Q. But you bet on the side of it being true,        | 12:02:59 |
| 17 | right?                                              | 12:03:02 |
| 18 | A. Yeah, some chance. But this is more              | 12:03:04 |
| 19 | like, you know, this is like -- this is just saying | 12:03:06 |
| 20 | it's suspicious. It's a likely -- who knows what's  | 12:03:11 |
| 21 | going on there.                                     | 12:03:15 |
| 22 | Q. What was -- what were you -- I mean,             | 12:03:15 |
| 23 | don't you -- I would think, Mr. Musk, that you're a | 12:03:15 |
| 24 | very goal-oriented person. In other words, you      | 12:03:17 |
| 25 | define your objective and you work to achieve it.   | 12:03:24 |

1 Q. And he understood where the cave 12:55:22  
2 system -- he had been in the cave system many times 12:55:24  
3 in the seven years prior, and was very familiar 12:55:28  
4 with it. In other words, where you might have 12:55:31  
5 problems getting through the passageway, things 12:55:34  
6 like that? 12:55:39

7 A. I mean, those caves have been mapped 12:55:40  
8 since the '60s to my understanding, and many people 12:55:42  
9 knew those caves, and he was one of them. 12:55:46

10 Q. Well, you're not trying to take away from 12:55:48  
11 Mr. Unsworth's role in this rescue, are you? 12:55:50

12 A. I -- 12:55:53

13 Q. I know you've said he wasn't a diver. 12:55:53

14 A. No. I'm just saying that he's not the 12:55:56  
15 only one who knows those caves. 12:55:58

16 Q. Do you believe that Mr. Unsworth should 12:56:01  
17 be commended for what he did at that cave system 12:56:02  
18 for those boys for several days? 12:56:07

19 MR. SPIRO: Objection; completely 12:56:11  
20 irrelevant. 12:56:12

21 BY MR. WOOD: 12:56:12

22 Q. Please answer my question. 12:56:12

23 A. Yes. Yes, I do. 12:56:13

24 Q. He should be commended? 12:56:14

25 A. I agree. 12:56:16

1 Q. Not attacked, wouldn't you agree? 12:56:17

2 A. Yes. 12:56:19

3 Q. And Mr. Musk, in your -- look at 12:56:19

4 Exhibit 38 again. 12:56:25

5 A. Okay. 12:56:27

6 Q. At the top, your tweet of the 15th of 12:56:27

7 July: "Never saw this British expat guy who lives 12:56:37

8 in Thailand (SUS) at any point when we were in the 12:56:40

9 caves." 12:56:44

10 Have I read that correctly? 12:56:44

11 A. That's correct. 12:56:47

12 Q. What did "(SUS)" mean? What were you 12:56:47

13 conveying by putting "(SUS)," S-U-S? 12:56:48

14 A. Suspicious. 12:56:53

15 Q. Of being a pedo guy? 12:56:57

16 A. Just a weird guy. My impression at the 12:56:59

17 time was that he was -- he was just looking for 12:57:04

18 publicity, that he had not -- at the time I did not 12:57:07

19 believe he had played any role. I had not seen him 12:57:12

20 or I had not heard his name at any point in this 12:57:16

21 process. And so I assumed he was just some 12:57:20

22 creepy-ass expat looking for press. His motives 12:57:24

23 seemed very doubtful, and he said things that were 12:57:28

24 false. 12:57:31

25 Q. But you didn't know what you were talking 12:57:32



1 about at the time you were writing about him, 12:57:34  
2 because you didn't know anything about what his 12:57:35  
3 involvement had been. 12:57:38  
4 Isn't that true, sir? 12:57:39  
5 A. It struck me as odd, that despite all of 12:57:40  
6 our interactions with Stanton and many others, that 12:57:41  
7 his name had never come up. 12:57:45  
8 Q. Upon reflection? 12:57:48  
9 A. And he was nowhere to be seen. 12:57:48  
10 Q. Upon reflection? When did it strike you 12:57:51  
11 as odd that his name had never come up? When you 12:57:53  
12 were talking to Rick Stanton, you didn't know who 12:57:56  
13 Vernon Unsworth was, or that he even existed? 12:57:59  
14 A. No. I never heard the name. 12:58:02  
15 Q. So when did you first think it was odd 12:58:03  
16 that his name had not come up in your conversations 12:58:05  
17 with Rick Stanton? 12:58:08  
18 A. Or anyone else, or anyone in the Thai 12:58:10  
19 government, or at all from anyone. 12:58:13  
20 Q. There were thousands of people out there 12:58:14  
21 involved in this effort. You knew that? 12:58:15  
22 A. Yeah, I knew. I had not read his name; I 12:58:18  
23 had not heard his name; nobody had mentioned his 12:58:21  
24 name at all. First I heard of him was like seeing 12:58:24  
25 this CNN article where he tells me to shove the sub 12:58:30

1 Q. Is that all? 13:09:51

2 A. Yeah, that's about it. They're obviously 13:09:52

3 quite salacious and they have these lists. So I 13:09:56

4 didn't think them as hard-hitting reporters, you 13:10:00

5 know, that kind of thing. 13:10:03

6 Q. You didn't think much about their 13:10:04

7 reporting or their journalistic standards, did you? 13:10:06

8 A. They had -- their journalistic standards 13:10:10

9 is a different matter, because even sort of very 13:10:13

10 populist things, even the TMZs of the world have 13:10:19

11 journalistic standards. This is different from 13:10:22

12 whether they report on highly credible matters. 13:10:26

13 Q. Yeah, but where did you put BuzzFeed in 13:10:28

14 that chain, you know, above TMZ? Below TMZ? What 13:10:30

15 was your opinion of BuzzFeed before all this came 13:10:35

16 up in 2018? 13:10:38

17 A. I thought they were a news organization 13:10:39

18 that was striving for credibility despite a name 13:10:41

19 that suggests otherwise, and that they would, you 13:10:44

20 know, certainly adhere to normal journalistic 13:10:50

21 standards and integrity. 13:10:53

22 Q. What did you base that on? 13:10:56

23 A. We've had some prior interaction with 13:11:00

24 them on articles. They generally adhered to -- or 13:11:02

25 they had always adhered to journalistic standards 13:11:08

1 of behavior. 13:11:13

2 Q. Had you ever -- anybody in your 13:11:14

3 organization's ever provided them information by 13:11:16

4 sending them an email or a letter that simply 13:11:17

5 started off saying "Off the record" or "on 13:11:19

6 background"? 13:11:24

7 A. I think we've probably sent these things 13:11:29

8 to them. 13:11:33

9 Q. When? 13:11:34

10 A. This is standard practice in my 13:11:34

11 interaction with journalists is if you say 13:11:36

12 something is off the record, it is off the record. 13:11:41

13 If you say it is on the record, it is on the 13:11:42

14 record. 13:11:45

15 BuzzFeed's claim that this requires 13:11:45

16 positive confirmation is not consistent with my 13:11:47

17 interaction with reporters. 13:11:52

18 Q. How many years have you served in some 13:11:53

19 capacity as a CEO? 13:11:55

20 A. 26. 13:12:01

21 Q. And during your 26 years serving as CEO 13:12:02

22 of various companies, have you ever received any 13:12:06

23 media training? 13:12:09

24 A. A long time ago. 13:12:14

25 Q. What was that? 13:12:16

1           A.    I had like one person tell me this is           13:12:17  
2    what you are supposed to say to the press and not           13:12:20  
3    say to the press.   A long time ago; 25 years ago.           13:12:24  
4           But there generally were in favor of           13:12:27  
5    communications that were bland and uninteresting,           13:12:32  
6    and generally sounded like corporate propaganda,           13:12:37  
7    which is not genuine, it doesn't resonate; it's           13:12:42  
8    sort of fake corporate PR.   I think it is much more           13:12:44  
9    important to authentic, genuine, even if you make           13:12:53  
10   mistakes along the way.           13:13:00  
11          Q.    Where did you receive your training on           13:13:06  
12   the use and meaning of the terms "off the record,  
13   on background, not for attribution"?   Those types           13:13:11  
14   of phrases -- where did you learn that?           13:13:16  
15          A.    In interacting with thousands of media           13:13:21  
16   over a quarter century.           13:13:24  
17          Q.    Name somebody in the last two years where           13:13:26  
18   you had unilaterally sent them information saying           13:13:28  
19   "off the record," without any discussion and           13:13:30  
20   agreement from the journalist.           13:13:34  
21                  How many times has that happened?           13:13:36  
22          A.    I believe this has happened many times           13:13:38  
23   with many different publications.   I'd have to go           13:13:41  
24   check my email.           13:13:43  
25          Q.    Give just one name.           13:13:45

|    |    |                                                   |          |
|----|----|---------------------------------------------------|----------|
| 1  | A. | My recollection is dozens of times.               | 13:13:46 |
| 2  | Q. | Name just one person in the last couple           | 13:13:49 |
| 3  |    | of years. Has it happened in the last couple of   | 13:13:49 |
| 4  |    | years?                                            | 13:13:52 |
| 5  | A. | I think so.                                       | 13:13:52 |
| 6  | Q. | Sorry?                                            | 13:13:53 |
| 7  | A. | I think so.                                       | 13:13:53 |
| 8  | Q. | So do you have the ability to go back and         | 13:13:53 |
| 9  |    | to try to find where you would have sent          | 13:13:54 |
| 10 |    | information to someone saying "off the record"    | 13:13:56 |
| 11 |    | without having talked to them and decided, number | 13:13:58 |
| 12 |    | one, what does "off the record" mean, and two, do | 13:14:00 |
| 13 |    | you agree to it? You have done that before?       | 13:14:04 |
| 14 | A. | I think so. My recollection is that I             | 13:14:08 |
| 15 |    | have done this several times.                     | 13:14:10 |
| 16 | Q. | And so you're comfortable under oath              | 13:14:12 |
| 17 |    | stating that you have done that several times?    | 13:14:15 |
| 18 | A. | No. I just said I believe I have done             | 13:14:17 |
| 19 |    | this. So I would have to go ahead and check.      | 13:14:19 |
| 20 | Q. | You may not have?                                 | 13:14:20 |
| 21 | A. | It's possible. My recollection is that I          | 13:14:21 |
| 22 |    | have, but I would need to confirm it.             | 13:14:23 |
| 23 | Q. | Why did you want the information that you         | 13:14:26 |
| 24 |    | sent to Mr. Mac to be off the record?             | 13:14:29 |
| 25 | A. | Because I was not sure that it was                | 13:14:33 |

1 accurate. But if it was, and we have another 13:14:36  
2 Jeffrey Epstein on our hands, then we should find 13:14:40  
3 out and take action. 13:14:41  
4 Q. Jeffrey Epstein not been in the news 13:14:45  
5 since he was convicted in Florida as of August of 13:14:49  
6 2018. The new charges against him were in 2019. 13:14:52  
7 Do you recognize that? 13:14:55  
8 A. Yes. I'm using this as an example of, 13:15:00  
9 you know, if this guy is actually doing bad things 13:15:03  
10 and could potentially be using the good reputation 13:15:08  
11 acquired from the cave rescue to do bad things, 13:15:15  
12 then this is something that should be stopped. So 13:15:20  
13 shouldn't we like, look into it; find out if it is 13:15:23  
14 true. 13:15:26  
15 Q. So you wanted Mr. Mac to have the 13:15:27  
16 information, right? 13:15:32  
17 A. I wanted him to investigate, because I'd 13:15:37  
18 heard these -- what sounded like a pretty bad 13:15:40  
19 information pattern from this investigator related 13:15:47  
20 to me through Jared, and it sounded pretty bad, so 13:15:49  
21 maybe this guy has got some serious issues, and if 13:15:54  
22 so, we -- they should find out. Just trying to do 13:16:00  
23 the right thing here. 13:16:05  
24 Q. So but at the time you wrote this 13:16:06  
25 information to Mr. Mac, you tell me you didn't know 13:16:07

1 whether it was true or not, right? 13:16:10

2 A. Yes. I specifically said try to find out 13:16:12

3 if this is true. I had been told directly that 13:16:16

4 there were very suspicious situations, that there 13:16:23

5 was -- I had been told by Jared that this 13:16:26

6 investigator had said that -- that it looked quite 13:16:29

7 bad, and that, you know, what he is up to in 13:16:35

8 Thailand sounded pretty bad, so it seems like, if 13:16:41

9 you are a journalist and you care about doing the 13:16:44

10 right thing, you should go and find out if it's 13:16:46

11 true, and if it is, then take action. 13:16:50

12 Q. But sir, the point is, you didn't know 13:16:52

13 whether the investigator's information was true or 13:16:56

14 not or had been verified, right? Isn't that right? 13:17:00

15 A. That's right. That's why I said "Please 13:17:06

16 go and investigate." 13:17:09

17 Q. So why, if you were so interested in 13:17:10

18 Mr. Mac investigating, why did you not tell Mr. Mac 13:17:12

19 the source of your information, what your 13:17:17

20 information precisely was, and ask him to go out 13:17:20

21 and see if he could verify whether it was true? 13:17:24

22 A. Because as soon as he said he was going 13:17:28

23 to ignore my "off the record" -- that, you know, my 13:17:30

24 comments that these were off the record, then he -- 13:17:37

25 this was like this guy obviously cannot be trusted. 13:17:40

1 This is my opinion that he had no journalistic 13:17:44  
2 ethics, and so any further correspondence was 13:17:48  
3 pointless. 13:17:50  
4 Q. Who told you that Mr. Unsworth was a 13:17:52  
5 child rapist? Did Jared tell you that? 13:18:01  
6 A. No. I didn't say that he was. I think I 13:18:10  
7 said we need to find out if he is. 13:18:11  
8 Q. Why did you use the term "child rapist"? 13:18:15  
9 Who had used that term with you that made you 13:18:18  
10 repeat it in your email to Mr. Mac? 13:18:21  
11 A. Well, I think anyone who is -- if 13:18:25  
12 somebody is sleeping with someone who is 12 years 13:18:27  
13 old, I would say that that person is a child 13:18:31  
14 rapist. 13:18:32  
15 Q. What information did you have at the 13:18:33  
16 time -- and that's what you told Mr. Mac in the 13:18:35  
17 "off the record," as you called it, email -- that 13:18:38  
18 he was a child rapist, married to a 12-year-old 13:18:41  
19 child bride, right? 13:18:44  
20 A. I told him this is -- you should go and 13:18:46  
21 find out if this is true. 13:18:49  
22 Q. What were you basing that on? 13:18:51  
23 A. I was basing that on what this 13:18:53  
24 investigator had told Jared who had told me. 13:18:56  
25 Q. Did you ever pick up the phone say "I 13:18:59



1 want to talk to this investigator myself"? 13:19:00

2 A. I did not talk to this guy directly. 13:19:04

3 Q. Did you ever ask to? 13:19:06

4 A. No. I have faith that what Jared was 13:19:09

5 conveying to me was an accurate retelling of this 13:19:11

6 guy. 13:19:15

7 Q. Jared was not the source the information. 13:19:15

8 A. Right. 13:19:18

9 Q. Jared couldn't verify it or not. It had 13:19:18

10 to come from the source. The source was the 13:19:20

11 investigator. You made no effort to -- before you 13:19:22

12 wrote Ryan Mac, you didn't lift a finger to try to 13:19:26

13 find out whether the investigator was telling you 13:19:29

14 the truth or whether the investigator was taking 13:19:31

15 you for a ride for \$52,000, did you, sir? 13:19:34

16 A. This investigator appeared to be 13:19:41

17 credible. I did not make these comments on the 13:19:43

18 record. I didn't mean for them ever to be 13:19:47

19 published in any way, shape, or form. 13:19:48

20 I just -- I'd just been informed of a bad 13:19:50

21 fact pattern. It seems like if a journalist cares 13:19:56

22 about finding out what's going on, they should go 13:20:00

23 and find out what's going on. This is what I've 13:20:02

24 been told. May or may not be true; please 13:20:05

25 investigate. 13:20:08

1 I'm followed by a lot of journalists, that they 14:22:32  
2 should just find out whether these things were 14:22:36  
3 true; like they should look into it. You've got 14:22:39  
4 Drew Olanoff, the Yoda guy, @yoda. It's like, Yo, 14:22:41  
5 man, why don't you just like see if there is any 14:22:41  
6 veracity to the situation? 14:22:52  
7 Q. Well, actually, you tweeted back @yoda? 14:22:53  
8 A. Yoda. Yeah. 14:22:56  
9 Q. Well, @yoda. That was his name. You 14:22:56  
10 made reference to him. 14:23:01  
11 A. Yes. 14:23:02  
12 Q. Your name is Yoda. You go by Yoda, but 14:23:02  
13 you don't seem very yodaish. Something like that. 14:23:03  
14 A. That's right. 14:23:05  
15 Q. I mean, you tweeted @yoda "Don't you 14:23:10  
16 think it's strange that he hasn't sued me," didn't 14:23:12  
17 you? 14:23:16  
18 A. Yes. 14:23:17  
19 Q. Strange in what way? 14:23:19  
20 A. Strange implying perhaps there is some 14:23:20  
21 guilt there. 14:23:23  
22 Q. Right. The tweet that you published in 14:23:24  
23 response to Yoda's tweet conveyed that, the idea 14:23:28  
24 that here's a guy that's got three lawyers I think 14:23:31  
25 you referenced. 14:23:37

|    |                                                     |          |
|----|-----------------------------------------------------|----------|
| 1  | A. Yes.                                             | 14:23:38 |
| 2  | Q. Don't you think it's strange he hasn't           | 14:23:38 |
| 3  | sued me, conveying the idea that this guy may be    | 14:23:38 |
| 4  | guilty and that's why he's not suing me, true?      | 14:23:43 |
| 5  | A. Yes.                                             | 14:23:47 |
| 6  | Q. That he might in fact be a pedophile,            | 14:23:47 |
| 7  | right?                                              | 14:23:49 |
| 8  | A. Possibly.                                        | 14:23:52 |
| 9  | Q. Yeah, I mean, that's what you were               | 14:23:53 |
| 10 | conveying?                                          | 14:23:54 |
| 11 | A. Possibly.                                        | 14:23:55 |
| 12 | Q. Well, no, not possibly conveying. When           | 14:23:56 |
| 13 | you made that tweet, you were conveying in your     | 14:23:58 |
| 14 | mind's eye just what you've told me. It's strange   | 14:24:01 |
| 15 | that he hadn't sued me, and it suggests he might be | 14:24:04 |
| 16 | guilty of pedophilia.                               | 14:24:08 |
| 17 | A. I think --                                       | 14:24:10 |
| 18 | Q. Right?                                           | 14:24:10 |
| 19 | A. You're putting words in my mouth here.           | 14:24:10 |
| 20 | Q. I am not trying to do that. I'm trying           | 14:24:11 |
| 21 | to -- I think that's what you told me.              | 14:24:12 |
| 22 | A. No. I simply said it's strange that -- I         | 14:24:14 |
| 23 | meant those words literally. That's strange. That   | 14:24:19 |
| 24 | does not mean that he was a pedophile; just means   | 14:24:22 |
| 25 | perhaps he has something to hide.                   | 14:24:25 |

1 Q. Question: "The tweet that you published 14:24:28  
2 in response to Yoda's tweet convey that here is a 14:24:30  
3 guy with three lawyers"? 14:24:34  
4 A. Yes. 14:24:37  
5 Q. And you're saying -- conveying the idea 14:24:37  
6 "this guy may be guilty. This is why he is not 14:24:41  
7 suing me. True." And your answer: "Yes, he might 14:24:43  
8 in fact be a pedophile, right." Answer: 14:24:46  
9 "Possibly." Question: That is what you were 14:24:48  
10 conveying. Answer: "Possibly." 14:24:51  
11 Is that your testimony? 14:24:53  
12 A. I want to be clear. Perhaps there was 14:24:56  
13 something odd going on. It's does not mean he is a 14:25:00  
14 pedophile or not a pedophile. But perhaps he does 14:25:02  
15 not want his situation investigated. 14:25:05  
16 Q. What are you talking about if it's not a 14:25:08  
17 pedophile? 14:25:10  
18 A. Who knows? 14:25:11  
19 Q. The whole controversy is about the pedo 14:25:12  
20 guy? 14:25:15  
21 A. People don't want their background 14:25:15  
22 investigated for all sorts of reasons. 14:25:17  
23 Q. But why did you want his background 14:25:19  
24 investigated? 14:25:21  
25 A. In case there was something seriously bad 14:25:22

1 going on. Pedophilia being potentially one of 14:25:24  
2 those things. 14:25:26

3 Q. That was the issue. That was the issue 14:25:28  
4 on the forefront, whether or not he was a 14:25:33  
5 pedophile. You were aware that that was the 14:25:35  
6 controversy that you sparked with "pedo guy." You 14:25:40  
7 know that, don't you, sir? 14:25:43

8 A. The pedo guy was certainly not intended 14:25:48  
9 to be any kind of accusation of pedophilia. It was 14:25:52  
10 simply an insult. 14:26:01

11 The investigator who merely was, in 14:26:03  
12 retrospect, just taking us for a ride, came back 14:26:08  
13 with what sounded like very serious information 14:26:12  
14 that, you know, perhaps there was something 14:26:18  
15 problematic going on. 14:26:23

16 I mean, he claimed that Unsworth had a 14:26:25  
17 12-year-old bride. I mean, that's obviously -- in 14:26:30  
18 that case it would be pedophilia of course. 14:26:35

19 Q. As you sure as you sit here today that 14:26:39  
20 the investigator conveyed that Mr. Unsworth had a 14:26:41  
21 12-year-old bride? 14:26:45

22 A. That is my recollection of what Jared 14:26:47  
23 told me, yes. 14:26:50

24 Q. Well, Jared told you he was getting 14:26:50  
25 written reports, right? 14:26:53

|    |                                                    |          |
|----|----------------------------------------------------|----------|
| 1  | A. Yes.                                            | 14:26:54 |
| 2  | Q. And did you say "Let me see what you've         | 14:26:55 |
| 3  | got there"?                                        | 14:26:57 |
| 4  | A. I asked Jared to convey the essence of          | 14:27:02 |
| 5  | the reports. I don't recall seeing the reports.    | 14:27:05 |
| 6  | And he conveyed the essence of the reports; one of | 14:27:07 |
| 7  | which that it's rumored to have a 12-year-old      | 14:27:11 |
| 8  | bride.                                             | 14:27:14 |
| 9  | Q. Do you deny under oath seeing any of the        | 14:27:16 |
| 10 | written reports or emails sent by the investigator | 14:27:20 |
| 11 | to Jared?                                          | 14:27:24 |
| 12 | A. I do not -- I'm confident -- I'm                | 14:27:28 |
| 13 | confident I didn't see the reports. I don't --     | 14:27:32 |
| 14 | maybe there was an email. I don't know if there    | 14:27:35 |
| 15 | was an email. There was an email that was sent,    | 14:27:39 |
| 16 | but --                                             | 14:27:44 |
| 17 | Q. There were several?                             | 14:27:45 |
| 18 | A. I have seen emails, but --                      | 14:27:47 |
| 19 | Q. From the investigator?                          | 14:27:49 |
| 20 | A. Yes.                                            | 14:27:50 |
| 21 | Q. To Jared?                                       | 14:27:51 |
| 22 | A. Yes. But you're confusing emails and            | 14:27:53 |
| 23 | reports.                                           | 14:27:55 |
| 24 | Q. I didn't mean to. Well, maybe I did.            | 14:27:57 |
| 25 | There were some reports that were kind of more     | 14:27:57 |

1 Q. Right. Do you routinely insult people 15:14:52  
2 when you don't know what in the hell you're talking 15:14:56  
3 about? 15:14:59

4 A. No. In this case I do know what I'm 15:15:01  
5 talking about. When you try to shake me down, it's 15:15:03  
6 unequivocal. 15:15:06

7 MR. WOOD: All right. Thank you. Let's 15:15:09  
8 take a break. 15:15:09

9 THE VIDEOGRAPHER: And we are going off 15:15:12  
10 the record at 3:15 p.m. 15:15:12

11 (Recess taken.) 15:33:02

12 THE VIDEOGRAPHER: And we are back on the 15:33:02  
13 record at 3:33 p.m. 15:33:09

14 BY MR. WOOD: 15:33:11

15 Q. Mr. Musk, do you know Richard Harris? 15:33:11

16 A. Richard Harris. I'm not sure. That 15:33:21  
17 name -- sorry, could you refresh me? 15:33:23

18 Q. He's referred to as an Australian 15:33:25  
19 specialist who was brought in by the Thai 15:33:27  
20 government to aid the Thai cave rescue operation. 15:33:29

21 Do you know who Mr. Harris is? 15:33:33

22 A. I don't -- I don't -- the name is -- 15:33:38  
23 doesn't -- I'm actually not familiar with 15:33:39  
24 Mr. Harris. I may know him, I may have had -- the 15:33:42  
25 name doesn't ring a bell. 15:33:44

1 Q. How about Craig Challen, C-H-A-L-L-E-N? 15:33:47

2 A. No. 15:33:52

3 Q. Did you read the article that Mr. Mac 15:33:53

4 published? And I had in front of you as 15:33:55

5 Exhibit 44. 15:33:59

6 A. I am not sure I read the whole article. 15:34:00

7 Q. Take a moment, if you would. 15:34:03

8 MR. SPIRO: Read the whole article? 15:34:30

9 THE WITNESS: Yes. 15:37:47

10 BY MR. WOOD: 15:37:47

11 Q. Have you read it? 15:37:47

12 A. Did it include everything else, the 15:37:49

13 exhibits and whatnot? 15:37:52

14 Q. No, no. I just wanted you -- the exhibit 15:37:53

15 was, I think, the Thai article that you had seen, 15:37:53

16 right? 15:37:56

17 A. Yes. 15:37:58

18 Q. Why did you send that to him? 15:37:58

19 A. I'm sorry? 15:38:01

20 Q. Why did you send Mr. Mac a copy of the 15:38:01

21 letter you had received from the prime minister? 15:38:06

22 A. To make clear that I was welcomed, not 15:38:10

23 kicked out of the cave as Unsworth falsely claimed. 15:38:13

24 Q. And who told you that Mr. Unsworth would 15:38:20

25 have been banned from the site as you falsely 15:38:22



1 claimed? 15:38:25

2 A. I had heard from some of the SpaceX 15:38:31

3 engineers that he -- that they had talked to 15:38:39

4 somebody who had said that he had -- they -- his 15:38:41

5 name didn't come up. And he was not -- you know, 15:38:46

6 they either hadn't -- didn't know who he was, or if 15:38:50

7 they did know who he was, they said they didn't 15:38:55

8 want him there. That was my recollection. 15:39:01

9 Q. If they didn't know who he was, they did 15:39:04

10 not want him there? 15:39:06

11 A. Some people didn't know who he was, and 15:39:09

12 the others didn't want him there. 15:39:10

13 Q. Who were these people? First, who were 15:39:11

14 the SpaceX employees that reported that to you? 15:39:11

15 A. I believe it was a conversation with 15:39:14

16 Armor Harris. 15:39:14

17 Q. Anybody else besides Mr. Harris? 15:39:18

18 A. I think I asked a couple people. I'm not 15:39:19

19 sure who else. 15:39:19

20 Q. Mr. Harris, though, was somebody you 15:39:22

21 definitely know said that to you? 15:39:24

22 A. I believe -- that's my recollection. 15:39:25

23 Q. And did he tell you who had actually told 15:39:28

24 him that? 15:39:30

25 A. I'd asked him to inquire with people that 15:39:33

1 he had interacted with in Thailand. I don't know 15:39:34  
2 who. 15:39:39

3 Q. No names to offer me? 15:39:41

4 A. No. 15:39:42

5 Q. And then Rick Stanton. Page -- Bates 15:39:44  
6 label 2710. "I have no idea who gave you those 15:39:48  
7 concerns about Vern," Stanton wrote over Facebook 15:39:53  
8 Messenger. "They are completely unfounded. He was 15:39:56  
9 never kicked offsite by anyone, and worked 15:39:59  
10 continuously on the rescue for the full duration. 15:40:01  
11 He was pivotal to the entire operation." 15:40:04

12 Have I read that correctly? 15:40:06

13 A. Yes. 15:40:19

14 Q. Other than the comment that you say you 15:40:20  
15 attribute to Mr. Harris who attributed it to 15:40:22  
16 somebody whose name you don't know, as you sit here 15:40:22  
17 today do you have any factual knowledge yourself to 15:40:25  
18 contradict the truth of what Mr. Stanton said in 15:40:28  
19 that paragraph? 15:40:30

20 A. No. 15:40:34

21 Q. And then we go on and it asks you about 15:40:34  
22 Richard Harris and Craig Challen. 15:40:38

23 A. Um-hmm. 15:40:41

24 Q. "Vern seemed like an excellent guy and 15:40:41  
25 absolutely vital to the mission," said Harris, who 15:40:44

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I, ELON MUSK, do hereby declare under the penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this 5th day of September,  
2019, at Los Angeles, California.  
(City) (State)

A handwritten signature in black ink, appearing to be 'Elon Musk', is written over a horizontal line.

ELON MUSK

1 I, PATRICIA Y. SCHULER, a Certified  
2 Shorthand Reporter of the State of California, do  
3 hereby certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a  
8 verbatim record of the proceedings was made by me  
9 using machine shorthand which was thereafter  
10 transcribed under my direction; that the foregoing  
11 transcript is a true record of the testimony given.

12 Further, that if the foregoing pertains  
13 to the original transcript of a deposition in a  
14 Federal Case, before completion of the proceedings,  
15 review of the transcript [X] was [ ] was not  
16 requested.

17 I further certify I am neither  
18 financially interested in the action nor a relative  
19 or employee of any attorney of party to this  
20 action.

21 IN WITNESS WHEREOF, I have this date  
22 subscribed my name.

23 Dated: August 26th, 2019.

24 *Patricia Y. Schuler*

25 PATRICIA Y. SCHULER, CSR NO. 11949

# EXHIBIT 3

## The New York Times

# Thailand Cave Rescue Turns to How to Extract Trapped Soccer Team

By Richard C. Paddock and Muktita Suhartono

July 3, 2018

THAM LUANG CAVE, Thailand — The British diver John Volanthen was placing guide lines to try to get closer to 12 missing boys and their soccer coach trapped in a flooded cave network when he ran out of line himself, forcing him to the water's surface.

There they were, all 13, staring at him through the light of his headlamp. After 10 days of efforts racing against monsoon rains and rising water in the cave, the search for the missing soccer team had finally succeeded.

If his line had been even 15 feet shorter, he would have turned back and not reached them on that dive Monday night. The group would have spent at least another night on its own in the pitch black, not knowing if a rescue would ever come.

“Literally, he finished his line, stuck the line reel in the mud, and they were looking down,” Vernon Unsworth, his friend and fellow cave explorer, said Tuesday.

With the search officially turning to a rescue operation on Tuesday, the main question now has been the best way, and the best time, to get the boys and their coach out of the cave.

Capt. Anand Surawan of the Thai Navy raised the possibility that, under the worst-case scenario, the 13 would be in the cave for four months until the end of the rainy season.

“I was surprised myself,” said Supanat Danansilakura, chief of public relations for the Royal Thai Navy. “Four months?”

*[Read about the history of cave rescues and five missions that worked]*

Others argued that it would be hard on the boys and dangerous to leave them in the cave for so long, even if they had light, food and other supplies. They could be injured or risk infection and be harmed psychologically by a prolonged stay in such an environment.

The fact that officials and relatives of the boys were able to even discuss the best way to extract them is itself remarkable.

The boys, ages 11 to 16, and their 25-year-old coach disappeared into Tham Luang Cave on June 23 after a Saturday soccer practice. Heavy rain then began to fall, and water rose in the cave complex, blocking their exit.

“When we first discussed this mission, we said right away this mission is impossible,” said the governor of Chiang Rai Province, Narongsak Osottanakorn, who is overseeing the search and rescue operation. “In English, it will be mission impossible, like the movie. But the SEALs were very confident in their ability, and they told us they would bring the boys out.”



An old photo of some of the boys before the cave expedition that nearly turned disastrous. Linh Pham/Getty Images

The Thai government mounted a huge rescue operation and sent scores of divers into the cave to try to reach the area where the boys were believed to be. A top official said they would spare no expense.

A country that often appears divided between the rural poor and the urban elite found itself united by the hope of finding the missing boys. King Maha Vajiralongkorn Bodindradebayavarangkun took a personal interest in the search, sending kitchen trucks to feed the search crews and raincoats to protect them from the downpour.

Half a dozen countries sent teams to help, including the United States, whose team of 30 included 17 Air Force search-and-rescue specialists.

Relatives of the missing spent much of the 10 days of the search waiting for news in plastic chairs under a temporary awning near the operation's command center.

They jumped and shouted with glee on Monday night when they heard that the group had been found. By then, Thai officials had moved the relatives indoors to a private area, and the throng of journalists covering the search have mostly been kept from speaking to them.

Tham Luang Cave has been a daunting challenge. The seven-mile-long cave system is simple enough to hike and climb through during the dry season. But in the rainy season — in theory from July to November — the complex can fill with water, submerging many of its passageways.

Narongsak Osottanakorn, governor of Chiang Rai Province, second from right, heads the rescue operation. “Even though we are tired and weary, we are fully equipped,” he said.  
Linh Pham/Getty Images

Divers finally had a breakthrough, literally, when they chipped away at rocks and enlarged a passageway that had been too small to pass through while wearing an air tank.

Once they had created a large enough opening, they were able to push on to where they suspected the group was, roughly three miles from the cave entrance.

Mr. Volanthen and Rick Stanton, both civilian British divers, happened to be in the lead Monday night, laying the guide ropes that divers can use to pass through the murky or turbulent water.

It was when Mr. Volanthen ran out of line and surfaced that he saw the group of scrawny boys, some sitting, some standing, on a shelf above the water line.

He was relieved to find all of them alive. The boys were excited about the prospect of food.

“Eat, eat, eat,” one of the boys called out.

The two divers set up a pair of dive lights to illuminate the cave, no doubt the first light the group had seen in days.

Rescue workers carrying oxygen tanks to the cave late on Monday.  
Lillian Suwanrumpha/Agence France-Presse — Getty Images

It was the first of many deliveries of needed supplies, including food and medicine, over the next 24 hours.

“At the beginning, we had only hearts and manpower,” the governor said. “Lately we have all the resources. Even though we are tired and weary, we are fully equipped.”

Medical teams were giving the group high-protein food to help them regain their strength. And they were assessing how soon the trapped team would be in shape to move out of the cave.

Ben Raymenants, a Belgian diver who took part in the search, said in an interview with Sky News that bringing the boys out underwater in their weakened condition — with strong currents and many narrow passageways — would be a difficult and dangerous operation.

“This is one of the more extreme cave dives that I have done,” he said. “It is very far, and very complex. There is current. The visibility can be zero at times. So getting boys through there one by one, and the risk that they will panic is there. They can’t even swim.”



He continued: “So guiding a boy through in front of you could be quite challenging, especially if the rain picks up and there’s a strong flow and the visibility reduces to zero. When it starts raining the flow is so hard you can barely swim against it.”

He said two Thai Navy medical officers had volunteered to stay with the boys until the water level drops in a few months. There was little rain on Tuesday and the pumping operation is succeeding in sending a large amount of water out of the cave. But heavy rains are likely to return soon.

“It is really hard to give an opinion on what is the best solution,” he said. “I think the weather is going to be the deciding factor.”

Mr. Unsworth, a caver from Britain who lives nearby and has been exploring Tham Luang Cave for more than six years, said it would be far better for the boys to be taken out immediately by experienced cave divers than to be forced to wait for months.

“It is just the logistical thing of how to get them out, because they have never dived before,” he said. “They will have to learn very quickly, like in the next few hours. If not today, it could be tomorrow.”

He said the boys could use full face masks so they would not have to learn how to breathe through a demand valve, which most divers use.

Thai Navy SEAL divers and other experienced cave divers participating in the rescue should be able to take them safely through the cave system’s flooded passageways, he said.

Leaving them underground until the end of the rainy season, he said, “is not an option.”

Mike Ives contributed reporting from Hong Kong.

A version of this article appears in print on July 3, 2018, Section A, Page 6 of the New York edition with the headline: Thailand Mission Turns to How to Save the Boys in the Cave

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# EXHIBIT 4

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# British caver is hailed a 'magician' after convincing Thai officials to bring in heroic UK divers who found stranded schoolboys, aided by his knowledge of the tunnels

- Vernon Unsworth used his expert knowledge to guide the two British underwater cave experts to the missing schoolboys
- Thai Navy Seals had swum 3 miles into the cave with no luck in finding the boys
- Expert divers will teach the schoolboys how to dive and attempt their swim to freedom
- The boys can only escape from the cave after a doctor has declared that they are fit to swim after starving for ten days

By [NICK FAGGE IN MAE SAI, THAILAND, FOR MAILONLINE](#)

**PUBLISHED:** 15:49 EDT, 4 July 2018 | **UPDATED:** 07:55 EDT, 5 July 2018


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A British caver has been hailed 'a magician' after he used his unique knowledge of **Thailand's** underground tunnels to lead rescuers to the 12 stranded school boys.

Vernon Unsworth, from St Albans, Herts, convinced Thai officials to bring in heroic UK divers who found stranded schoolboys, a friend has revealed.

Mr Unsworth, who lives close to the Tham Luang Nang Non cave, reached the cave the day after the group of boys and their football coach went missing.

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He called on the two British divers Rick Stanton and John Volanthen, who were the first to reach the trapped boys alive on Monday.

Close friend Chaiyon Srisamut told MailOnline: 'Vern found out that the boys were stuck in the cave the next day.



The missing Thai schoolboys and their football coach were in high spirits after being discovered by the two British divers



Vernon Unsworth (pictured, above) managed to convince Thai officials to allow the British underwater cave experts to enter the natural chimney and reach the schoolboys



Matthew Broderick in NYC



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► Rock star Eddie Money known for the hit songs Take Me Home Tonight and Two Tickets To Paradise dies at age 70 from esophageal cancer



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## Thai rescue teams search for secret passage out of flooded cave



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Boys trapped in Thai cave 'may be rescued in stages'

'He knew that the water was the problem so he told the rescuers where to put sand bags to stop it reaching the cave. But this did not work.'

The Thai authorities took over and only turned back to Mr Unsworth when their efforts to extricate the youngsters failed.

'The Thai Navy Seals went into the cave but they could not see anything because the water is so muddy so they came back.

'Vern told me he knew some English guys who could definitely help. They are his friends and they had been here at the cave a couple of weeks before.

'The funny thing is that at first the authorities didn't want to pay attention to him. They didn't trust him and the governor did not want foreigners to be out at risk.

'But Vern convinced them and now they consider him as some kind of magician.'

The British potholers Mr Stanton and Mr Volanthen were confident that the footballers would be at the Pattaya Beach section of the cave due to Mr Unswoerth's intimate knowledge of the 8km tunnel network.

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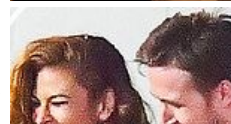
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## New footage of boys found after nine days in Thailand cave

She recently roped up about being a mom



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The star, 50, has new Judy Garland flick



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Called in 'one of my obsessions in life'



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▶ Jennifer Lopez wants her son Max, 11, to walk her down the aisle when she marries Alex Rodriguez... but she STILL has not set a





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Thai Navy SEALs with diving gear had swum some five kilometers (3 miles) into the cave with no luck in reaching the boys

wedding date



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**Expert divers will teach the schoolboys how to dive and attempt their escape out of the cave once they are strong enough after starving for ten days**

Mr Srisamu said: 'He used his knowledge of the cave to calculate where the group was mostly likely to be. And he was right.'

Rescuers face a race against time to get the boys out of the caves where they have been trapped for 11 days.

They are hoping to begin teaching the boys to swim as they attempt to free them from the flooded cave before the rainy season begins, which will push the water levels inside the tunnels up higher.

But they will have to wait until the trapped Thai boys have eaten solid food and gained weight before a perilous swim to freedom can be attempted.

Thai authorities have warned that the scuba dive cannot be made until a doctor rules that the children have recovered, after starving for ten days.

Only then will rescuers teach the group how to dive in their cave with the hope that they can manage the three-hour journey back to the outside world. The boys and their coach are being tended to around the clock by a team of Thai navy divers and a doctor.

► **Nathalie Emmanuel cuts a chic figure in silk floral co-ords as she joins a leggy Arizona Muse at Temperley LFW event**



► **Kristen Stewart puts on a VERY leggy display in tiny black shorts and a cropped blazer as she attends the Deauville US Film Festival in France**



► **Kim Kardashian reveals CBD products keep her calm as she runs her \$500M empire while tending to four kids: 'It's gotten me through a lot'**



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## Cave explorer says next 24hrs crucial for trapped team's survival

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Soldiers, rescuers and doctors are on standby to rescue the schoolboys and their football coach

Rescuers have been reluctant to be drawn on when the evacuation might be attempted from the Tham Luang caves in Chiang Rai. However, one senior official connected with the operation told The Times that he hoped it would begin imminently. The boys — aged from 11 to 16 — would be accompanied by professional divers.

Edd Sorenson, of International Cave Rescue and Recovery, warned that swimming out of the cave would be "extremely dangerous" and that the boys might panic. "As long as they know that we know where they are, they have food, a way to keep warm, water or filtration systems and light, it would be safest to wait it out," he told the BBC.

An American expat and diving instructor working with the navy rescuers said that helicopters were exploring the outside of the cave for areas where rescuers might be able to drill through rock and lift the boys out.

James Corden goes on the attack after Bill Maher told overweight people to stop eating so much while encouraging 'fat shaming' to make a comeback



Christie Brinkley, 65, puts on a leggy display in barely-there spandex shorts as she arrives for another round of Dancing With the Stars rehearsals



Priyanka Chopra looks happy while modeling a black top and tan skirt as she lands in Toronto after enjoying NYFW. Busy actress is jetting around



Emily Ratajkowski unleashes her animal instinct with snakeskin print bag and flashes legs in denim miniskirt. She has been glimpsed here and there at NYFW



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Thai Interior Minister Anupong Paojinda has said the boys' only chance is to swim out through the flooded underground network and that swimming lessons will start on Wednesday or Thursday. He said on Wednesday: 'There are no other options besides getting them out through the flooded passages.'

Mr Unsworth, a British cave explorer based in Chiang Ra who was called in to help the rescue efforts, has said the next 24 hours is make or break for the boys.

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Christina Malone-Brown was born by cesarean section at a hospital in Germantown, Tennessee, on Wednesday night, which coincided with the 18th anniversary of the 9/11 terrorist attacks.

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A new study from the University of Colorado School of Medicine, has found that, with both the hormonal and the non-hormonal IUD, women can lower their cancer risk by up to 32%.

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## Autopsy reveals Italian cop killed during confrontation with two American teens was stabbed with so 'much violence' that hilt of the seven inch knife left bruises on his skin

The grisly autopsy results show that 35-year-old Carabinieri deputy brigadier Mario Cerciello Rega was stabbed 11 times and bled to death in the July 26 attack on the streets of Rome.

## News

cool' with celebrities



Brad Pitt hits the red carpet at Ad Astra premiere in Tokyo after son Maddox broke his silence on their strained relationship



Pretty in pink! Tammy Hembrow flaunts her washboard abs in a crop top as she completes a photoshoot for her activewear label Saski Collection



Natalie Portman tucks into a HUGE cookie as she gives a funny insight into her post-red carpet regime at the Toronto International Film Festival



'I was hurt by men': Cara Delevingne reveals Ashley Benson is first partner she's trusted and reveals advice she got from Harvey Weinstein



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Judgment day for Felicity Huffman as she faces up to one month in prison for her part in college admissions scandal  
Boston court hearing



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Adorable moment



Cristiano Ronaldo's girlfriend Georgina Rodriguez sizzles in plunging dress as she supports her beau at fragrance launch in Italy



British man reveals he's spent around \$155k on FIFTEEN surgeries to look like his Korean boy band idol Jimin from BTS - who he says is 'perfection'

Kim Kardashian flaunts her legs in silver mini skirt as she emerges from her New

## Mama June and her boyfriend Geno Doak face grand jury charges for cocaine possession after being arrested at an Alabama gas st...

**News**

## Texas mother-of-three says her vaping habit landed her in a medically-induced coma

**Health**

## Photos Captured Before It All Went Wrong

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## Shocking video shows young children strapped into booster seats in the back bed of pickup truck on Kansas freeway

The amateur video was shot by motorist Dmitri Fernandez who was driving along Route 54 in Wichita, Kansas earlier this month. A law enforcement official said the driver broke the law.

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## 'My time is growing near': Civil Right icon John Lewis is coming out soon on impeachment

'My time is growing near,' civil rights icon Rep. John Lewis said this week when asked about impeachment of President Donald Trump. He has been staying on the sidelines on the fraught subject.

**News**

York City hotel giggling and sipping on champagne

George Clooney's ex Lisa Snowdon cuts a stylish figure in a green ruffled midi as she joins Hayley Hasselhoff in a blush pink dress at London Fashion Week

OxyContin heiress Joss Sackler claims Courtney Love only refused to attend her New York fashion show because she didn't offer her enough money

YouTube star PewDiePie backtracks after his promise to donate \$50,000 to the Anti-Defamation League after his fans accused him of being 'bullied'

Kristen Stewart debuts spunky pink tresses while unveiling her honorary beach locker at the Deauville US Film Festival in France



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Supermodel Elle Macpherson reveals the secrets behind her famous body - and her top three recipes to replicate her sculpted physique

Real Housewives of Orange County star Emily Simpson's husband Shane 'failed the California bar exam' Shane took test after spending time apart

Britney Spears continues showing off her vacation style as she shows off her bikini body in swimsuit and mini dress during Hawaiian getaway

Amber Heard claims Johnny Depp is refusing to 'provide evidence of his abuse of drugs and alcohol' as she fights his \$50 million lawsuit

Downton Abbey's Michelle Dockery and Laura Carmichael head to Washington, D.C. to promote the movie as it hits movie theaters in the UK

Blanca Blanco models gold outfit... after bonding with Charlie's Angels legend Jaclyn



## Shocking moment soccer crowd BOO as US Armed Forces enlistees are asked to pledge loyalty to President Trump in 9/11 ceremony

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Ivanka Trump says she got her moral compass from her FATHER at private event for donors moderated by former Entertainment Tonight host ...

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## Top Cardiologist: This One Thing Will Properly Flush Out You...

Gundry MD Supplements

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'Hit them. Shoot them. But don't kill them': Philippines hardman president Duterte urges people to attack corrupt officials - but warns there may be no pardon if victim dies

In a speech made during his visit to Bataan yesterday the president suggested shooting corrupt officials if they ask for bribes but if they kill them they may not be pardoned.

News

## Doctor: "Doing This Every Morning Can Snap Back Sagging Skin (No Creams Needed)"

Beverly Hills MD

## 4 Signs Your Heart Is Quietly Failing You

PhysioTru

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## MOST WATCHED NEWS VIDEOS

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Garry Lyon reveals Danny Frawley 'wanted

Hilarious moment cheeky dog teaches

Mothers arrested for allegedly running day

Daredevil defies his age to slide down

Oakland evicts and tears down homeless

Meghan leaves first official engagement

Shocking moment pedestrian hit while

CCTV catches clever dog using training toilet

Smith at a Farrah Fawcett fundraiser  
She looked amazing



'My Papa... always missing you': Nicole Kidman posts a touching tribute to her late father Antony on the fifth anniversary of his death



Liam Hemsworth enjoys island getaway with his family and friends as Miley Cyrus continues to flaunt her romance with Kaitlynn Carter



Brooklyn Beckham steps out with a female pal just hours after sparking reconciliation rumors with model Hana Cross



SNL's newest cast member Shane Gillis sparks outrage after videos resurface of him making shocking racial slurs and homophobic jokes



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'When I'm his age, I won't have my husband': Penny Lancaster, 48, admits she dwells on the thought of husband Rod Stewart, 74, dying due to their age gap



Rosamund Pike transforms into legendary physicist Marie Curie in new teaser trailer for Radioactive ahead of movie's premiere



Rihanna dons dramatic black dress with hoop skirt as she makes her grand entrance to her star-packed Diamond Ball... while Cardi B channels inner princess



Felicity Huffman arrives in Boston with her husband William H Macy for sentencing as she fights to avoid jail time in college admissions scandal



Idris Elba's glamorous wife Sabrina cuts a demure figure in a chic black dress and navy coat as she attends Mark Fast's SS20 show at LFW

As Love Actually's Thomas Brodie-Sangster unveils new

look, we reveal the  
different fortunes of the  
cast - from a comedian  
to Oscars success

▶ Michael Caine, 86,  
looks slick in a suit and  
holds hands with wife  
Shakira, 72, as they  
head out for a dinner  
date in London

▶ Normani defies gravity  
in mega-revealing white  
satin gown at Rihanna's  
fifth annual Diamond  
Ball in New York City  
Former Fifth Harmony  
star caught the eye

▶ Comedian Billy  
Connolly explains to a  
bagpipe player that he  
has Parkinson's after  
the musician spotted  
his hands were shaking  
while filming

▶ Meghan Markle's pals  
including Jessica  
Mulroney say they're 'so  
proud' after charity  
clothing launch - as  
shoppers sell items for  
THREE times the price

## MORE TOP STORIES

### ADVERTISEMENT

▶ Wendy Williams  
flaunts her ample  
cleavage in a plunging  
black floral dress for her  
'arrival ensemble' for  
appearance on Late  
Night With Seth Meyers

▶ Miley Cyrus flashes  
her abs as she fights  
crime with Ariana  
Grande and Lana Del  
Rey in action-packed  
Don't Call Me Angel  
music video  
The ladies are ready

▶ Keiynan Lonsdale  
thanks Señorita siren  
Camila Cabello for  
letting him 'join the  
magic' and appear in  
her Liar music video

▶ Jersey Shore: Family  
Vacation: Vinny  
Guadagnino strips  
down to get oiled up by  
Angelina Pivarnick  
The 31-year-old reality  
star stripped down

▶ Ashley Roberts wows  
in a lime green two-  
piece as she continues  
birthday celebrations  
with pregnant Pussycat  
Dolls bandmate  
Kimberly Wyatt

▶ Brad Pitt gets a  
standing ovation from  
fans as he surprises



Ellen by posing as a  
guest in her studio  
audience  
He was sat among fans

▶ Gwyneth Paltrow will  
have a steamy affair  
with Martina Navratilova  
in Ryan Murphy's  
upcoming Netflix series  
The Politician

▶ Meryl Streep faces  
backlash for playing a  
secret Latina character  
in her new film The  
Laundromat  
May very well add to her  
21 Oscar nominations

▶ Bond Girl Ana de  
Armas looks stunning in  
black midi dress while  
running errands in Los  
Angeles as she  
prepares to film scenes  
for No Time To Die

▶ James Bond 25: Daniel  
Craig's stunt double is  
flung through the air  
during a HUGE  
explosion as he films  
death-defying scenes in  
Italy for No Time To Die

#### ADVERTISEMENT

▶ DJ Khaled kisses his  
'Queen' Nicole Tuck's  
baby bump at Diamond  
Ball... after revealing  
they're having a son  
The 43-year-old rapper  
beamed with pride

▶ Friends star Lisa  
Kudrow says she  
struggled playing  
Phoebe Buffay in early  
years of hit NBC sitcom  
and still hasn't 'seen the  
show'

▶ Million Dollar Listing  
New York: Steve Gold  
and girlfriend Luiza  
Gawlowska learn  
gender of their baby  
Found out on Thursday's  
episode

▶ Pia Mia catches the  
eye in thigh-high gold  
boots with tiny denim  
shorts as she steps out  
for pre-birthday lunch  
Counts Kylie Jenner as a  
close pal

▶ Francis Ford Coppola  
is 'embarrassed' that  
The Godfather is Boris  
Johnson's favorite film  
and says Saddam  
Hussein and Gaddafi  
liked it too

▶ Cardi B and Offset get  
cozy on the red carpet  
and stare into each  
other's eyes before

heading into Rihanna's  
Diamond Ball in NYC

► Alaskan Bush People  
star Bear Brown reveals  
he is expecting a child  
with ex-fiancee Raiven  
Adams... just one day  
after calling off  
engagement

► Angelina Jolie  
transforms into the evil  
villain Maleficent in  
bewitching behind-the-  
scenes video from  
Disney set of the much-  
anticipated release

► Farrah Abraham says  
her daughter Sophia  
'definitely enjoyed 9/11'  
memorial as she  
apologizes for calling  
9/11 7-Eleven in video

► Joy Corrigan sizzles in  
ultra high-cut bikini  
bottoms as Kara Del  
Toro puts on a busty  
display for Revival  
NYFW showing

#### ADVERTISEMENT

► Bruce Springsteen  
cuts a sharp look in  
black at the TIFF  
premiere of his concert  
documentary Western  
Stars  
Had rave reviews

► Kylie Jenner serves an  
hourglass silhouette  
and a busty display in  
big sister Kim  
Kardashian's Skims  
shapewear  
The mother-of-one also  
bared it all



► In her element! Zara  
Tindall can't contain her  
smiles as she competes  
in a dressage event at  
Whatley Manor Horse  
Trials  
Job well done



► Eva Mendes reveals  
how date nights with  
Ryan Gosling require  
extra preparation now  
that they are parents  
They have two little girls  
Esmeralda and Amada



► 'I left a 20 year gap  
because I wasn't sure':  
Michael Sheen jokes  
about fathering second  
child two decades on  
from the first and claims  
'it will be much easier'



► Kim Kardashian West  
and Winnie Harlow are  
the epitome of beauty at





the launch event for makeup collaboration as part of Fashion Week in New York City



▶ Margot Robbie dons bizarre belted Chanel top to host Chateau Marmont dinner for Gabrielle fragrance Her second Chanel campaign



▶ Zoëy Deschanel enjoys outing with male pal in LA a week after confirming end of her four-year marriage Actress wore broderie anglaise maxi dress



▶ Lily Allen accuses Warner Music of failing to act after she told them she was sexually assaulted by a record industry executive who still works for the label



▶ VS Angel Cindy Bruna stuns in sheer green high-low gown at Rihanna's Diamond Ball in NYC Flashed an effervescent smile



#### ADVERTISEMENT

▶ Ariel Winter shows off her toned legs in a pair of tiny shorts as she enjoys casual make-up free outing in LA Sauntered along



▶ Arrest warrant issued for R Kelly after the incarcerated singer fails to appear in court or file response in criminal case related to alleged sexual assault of fan



▶ Kourtney Kardashian flaunts cleavage while shopping with Fai Khadra at Melitta Baumeister in West Hollywood German designer



▶ Alexandra Daddario calls out Meghan Markle for 'ruining' her yoga spot as she stops by James Corden's late night show



▶ G-Eazy and girlfriend Yasmin Wijnaldum share a kiss as they walk the red carpet at Rihanna's Diamond Ball G-Eazy has been stunning on red carpet



▶ Jennifer Garner channels Elsa from Frozen in gorgeous ice blue gown and is joined



by Zendaya and Camila Cabello at Save the Children Gala



► Britney Spears models multiple dresses with moxie as she enjoys Hawaiian vacation... after her father relinquished conservatorship



► Jamie Oliver gets back to work for the first time since the collapse of his restaurant empire as he shoots Christmas TV special with Rocketman star Taron Egerton



► Wendy Williams is a vision in flowing blue pleated jumpsuit for her appearance on Late Night With Seth Meyers ahead of her talk show's upcoming season



► Winnie Harlow has a wardrobe malfunction in pink satin dress as she arrives at the launch for her Kim Kardashian makeup collaboration at New York Fashion Week



#### ADVERTISEMENT

► Alessandra Ambrosio steps out with her kids for a juice date in Los Angeles... after mother-daughter date to NYFW They just took on fashion week by storm



► Poppy Delevingne takes fashion inspiration from Big Bird as she steps out in a giant yellow coat for a night on the town with a male pal in London



► 'I'm feeling better': Stephen Fry discusses his EIGHTY pound weight loss as he credits eight miles of walking every morning for his image overhaul



► Sylvester Stallone, 73, touts Rambo: Last Blood at press conference for the action movie in Mexico Fifth and final outing for iconic character



► George Michael's former lover Fadi Fawaz smokes a cigarette in the street as it emerges he is HOMELESS after moving out of budget hotel



► Karlie Kloss goes backless in plunging black gown at Rihanna's star-studded fifth



**annual Diamond Ball in NYC**

Diamond Ball is hosted by Seth Meyers



► Pamela Anderson gets foie gras taken off the menu at London's Playboy Club after complaining that the dish is 'downright vile'



► Karrueche Tran flaunts her legs in black mini dress at Kim Kardashian West and Winnie Harlow's beauty collab launch in NYC



► Judith Light's Walk of Fame star presentation brings out the celebrities including America Ferrera, Kathryn Hahn and even Farrah Abraham



► Selena Gomez looks effortlessly chic as she steps out in classic all black ensemble after surprise visit to her Texas middle school



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► Modern Love trailer brings the New York Times column to life with an all-star cast including Anne Hathaway Tina Fey and many more



► Pitch perfect! Ed Sheeran builds a soccer field at the bottom of the garden on his sprawling estate - after promising to switch off floodlights after midnight



► Kelly Osbourne struts out in classic rocker chic ensemble for red carpet kick-off of Halloween Horror Night at Universal Studios in Hollywood



► Bella Hadid cuts a casual figure in red denim and a graphic tee while out-and-about during NYFW

Walked on runways for multiple NYFW shows



► Kate Bosworth goes ladybug chic in red before swapping into chic yellow satin as she promotes new Netflix thriller The I-Land

Distinctive look



► Sarah Hyland is stylish in navy gown with embellished bodice at The Wedding Year





**premiere in LA**  
The actress, 28, wore her long hair loose



► **Sheryl Crow clarifies her comments and says she didn't mean to use 'big stink' in reference to Scooter Braun owning Taylor Swift's master recordings**



► **Elizabeth Hurley, 54, looks typically glamorous as she enjoys night on the town in a shimmering black ensemble**  
Youthful



► **Aaron Carter confesses he lied about why he went to rehab two years ago and reveals he was 'huffing aerosols'**  
Aaron confessed he lied



► **Kendall Jenner cuts a quirky figure in socks and sandals as she's out-and-about in New York City**  
She's spent past week dressed to the nines



#### ADVERTISEMENT

► **Margot Robbie is back in action as Harley Quinn as she re-shoots stunt sequences for Birds of Prey**  
Australian actress had a vintage Rolls Royce



► **Rihanna cuts a casual look in lush seafoam Balenciaga shawl as she arrives early to her star-studded Diamond Ball in NYC**



► **Golden goddess! Leggy Georgia Fowler stuns in a floor-length Grecian dress at Rihanna's fifth annual Diamond Ball**  
She's a Victoria's Secret model



► **Lori Loughlin hides under a floppy hat as she picks up six bottles of wine ... a day before Felicity Huffman will be sentenced in college admission scandal**



► **Laguna Beach alum Morgan Smith revealed she is expecting her third child with her hubby Joel Smith**  
Morgan is expanding her family



► **HBO is nearing pilot order for ANOTHER Game Of Thrones**



**prequel series focusing on House Targaryen**

Nearing a pilot order for yet another prequel



**▶ Elle Macpherson turns Sydney Airport into her very own catwalk... as she touches down looking stylish in tailored two-piece suit and shades**



**▶ Sheer delight! Shanina Shaik shows off her cleavage in a sheer white bustier dress as she arrives at Rihanna's Diamond Ball benefit in NYC**



**▶ Little Monsters second trailer reveals new zombie-filled footage plus Lupita Nyong'o covering Taylor Swift's Shake It Off**  
Hulu released



**▶ Hugh Jackman can't stop beaming as he's awarded with the coveted Order of Australia in Canberra... as his wife Deborra-Lee Furness watches on**



**▶ Nicole Kidman can't wait for her next play time to overcome her fear of stage-fright**  
The Oscar-winning actress waited 17 years



**▶ Salma Hayek plays the villain in the first trailer of her new movie Like a Boss starring Tiffany Haddish and Rose Byrne**

And now Salma Hayek is sharing the first trailer



**▶ VS Angel Devon Windsor bares her back in sexy floral dress at Rihanna's Diamond Ball in NYC**

Missing from her side was her fiancé



**▶ Mac Miller left behind \$7million in property following his tragic death from an accidental overdose**

His death rocked music world



**▶ Charlie Hunnam is all smiles as he walks TIFF red carpet for second day running at Jungleland premiere**

The former Sons Of Anarchy star



**▶ Justin Bieber dresses to match his hot pink Lamborghini as he runs errands with wife Hailey Baldwin**



Justin was back in husband-mode



► Adele files for divorce from estranged husband Simon Konecki after six months of separation and seven years together



► Demi Moore reveals she was raped at 15 and spiraled into alcohol and drug abuse at 42 after miscarrying a baby daughter with Ashton Kutcher



► 'I've got to get back to the baby - it's feeding time!' Meghan Markle rushes home to Archie after launching her Smart Works charity fashion range



► Nick Jonas goes to war in new trailer for Roland Emmerich's star-studded action-packed WWII movie Midway  
Nick plays Mate Bruno Gaido



► Melania's spokesman blasts backlash over a coat first lady wore in a 9/11 tribute - after critics claimed its stitching looked like a plane flying into a skyscraper



► Jenna Dewan cuts a casual chic look in patterned jumpsuit as she steps out with daughter Everly in LA  
Dewan is preparing to promote



► Bond Girl Naomie Harris sparkles in head-to-toe green sequinned co-ords as she makes a stylish arrival at LFW launch bash  
English actress, 43



► Looking Fancy! Iggy Azalea stuns on the cover of Galore as the rapper reveals she doesn't care about social media despite her Twitter meltdowns



► Influencer Caroline Calloway reveals on Instagram that her father has died - just two days after her ex-best friend exposed her as a scam artist



► Jeremy Renner requests sole custody of his six-year-old daughter as he fires back at ex-wife Sonni



during ugly custody  
battle

► Brody Jenner, 36, and  
girlfriend Josie  
Canseco, 22, take a road  
trip together... weeks  
after his ex Kaitlynn  
Carter moved on with  
Miley Cyrus

► Sharon Osbourne says  
her husband Ozzy  
Osbourne is 'getting a  
lot better' after a year  
filled with health battles  
Sharon has updated fans  
about Ozzy

► Lily Allen sets pulses  
racing as she shows off  
a glimpse of her lace  
lingerie underneath a  
pink kimono jacket  
while making a stylish  
arrival at LFW event

► Sam Smith 'asks loved  
ones to refer to him as  
"they" instead of "he"...  
six months after coming  
out as non-binary

► Sienna Miller prepared  
for latest film role by  
watching harrowing  
interviews with parents  
of missing children

► Rachel Zoe defends  
five-year-old son's long  
hair following mommy  
shamer attacks: 'It's not  
like I'm torturing him'  
Trolls have been telling  
her to cut his locks

► Kim Kardashian  
accuses sister Kourtney  
of stealing her style and  
raiding the best items  
from her designer  
friends in new KUWTK  
teaser



► Ellie Goulding shows  
off her toned abs and  
slender figure in a  
Burberry bikini as she  
enjoys her honeymoon  
with husband Caspar  
Jopling



**EXCLUSIVE** Stunt  
woman who lost arm in  
motorcycle crash on set  
of Resident Evil sues  
producers claiming they  
'abandoned' her after  
promising to pay bills



► Paul Walker birthday  
tributes: Dwayne 'The  
Rock' Johnson shares a  
message as the late  
actor's daughter  
Meadow calls him 'the





loveliest soul'



► She's a star! Hijab-wearing Halima Aden commands attention on the catwalks of New York Fashion Week  
She doesn't just walk the runway, she struts



► Demi Lovato debuts the neon green ends on her bob haircut... days after sharing unedited 'unafraid and proud' bikini photo  
Unveiled edgy new look



► Britney Spears' boyfriend Sam Asghari helps the singer keep a 'level head' amid drama with her ex husband Kevin Federline and father Jamie



► Meghan dresses up an understated outfit with FIVE bracelets including one belonging to Princess Diana - and she's wearing the late royal's earrings, too



► Meghan displays 'resilience and defiance' and is 'bouncing back' as she returns to work following maternity leave, claims a body language expert



► Jersey Shore's Mike 'The Situation' Sorrentino is released from prison after serving eight months for tax evasion and says he wants tot with wife



► Jennifer Lopez flaunts her unreal abs as she heads to the gym after defending Hustlers co-star Constance Wu from 'diva' accusations



EXCLUSIVE "You think they can handle me?" Megyn Kelly dishes on moderating a presidential debate and Charlize Theron playing her on screen



► Hana Cross and Brooklyn Beckham spark reconciliation rumors as they attend SAME event... after she started following him on Instagram again



► Plus-size model Hunter McGrady says she will NOT attend any fashion shows that aren't inclusive - as she reveals she turned





down 30 invites this season



► **The Flash's Robbie Amell and Designated Survivor star Italia Ricci welcome baby boy Robert**

Unveiled their good news on social media



► **Millie Bobby Brown ADMITS she faked controversial skincare video that saw her miming use of products over her makeup**



► **Orange crush! Celebs like Jennifer Lopez and Winnie Harlow aren't waiting six months to wear the hottest color on the spring 2020 runways**



► **Kevin Hart is doing 'amazing' post surgery as wife Eniko admits 'he'll be back on track in no time' after harrowing collision in Malibu**



► **Downton Abbey's Michelle Dockery and Elizabeth McGovern claim Dame Maggie Smith, 84, 'loves a meme'**

► **Lizzo brings the juice to Miami Beach performing in a curve loving costume for a sold-out crowd ... after remixing Truth Hurts with Cookie Monster**

► **Ansel Elgort says he lost the role of Elvis Presley in the upcoming Baz Luhrmann biopic to Austin Butler because he 'wasn't really prepared'**



► **DJ Khaled shares ultrasound video and announces he and wife Nicole Tuck are expecting a second son: 'God is the greatest'**



► **George Michael's former lover Fadi Fawaz is HOMELESS after moving out of budget hotel Travelodge he lived in after 'trashing the singer's home'**



► **Kim Kardashian reveals who her favorite Sunday Service singer is as she opens up about Kanye West's church on the Foodgod**



podcast



► **What REALLY made Prince Andrew get angry with aide: Royal turned on Queen's Master of Household because he couldn't book a room at Buckingham Palace**



► **Wild wild Wests! Kim and Kanye's kids Saint and Chicago wear adorable cowboy outfits from Wyoming**

The 38-year-old beauty guru showed off her kids



► **Amy Schumer is one proud mom as she holds her four-month-old baby Gene up to her face for a kiss**

The 38-year-old shared a sweet photo



► **Emilia Clarke exudes elegance in a burnt orange blazer and navy culottes as she attends theatre press night in London**



► **Katie Holmes shows off her slender stems as she saunters around the city in silky shorts**

Actress, 40, teamed black bottoms with a chunky melange knit



► **'Her hand began a trip from my knee': Judy Garland was so sex-obsessed she groped the crotch of a young female personal assistant in limousine**



► **RHONJ's Teresa Giudice puts on a brave face as she leaves husband Joe's bail hearing while he remains in ICE custody fighting deportation**

► **Catherine Zeta Jones, 49, cuts a chic figure in a black pant suit and cape as she holds hands with husband Michael Douglas, 74, at event in NYC**

► **Alexa Chung puts on a stylish display in a tweed jacket and smart pants as she steps out in London**

Enjoyed a late night outing in Soho

► **Demi Moore, 56, poses NUDE on the cover of a magazine for the first time in 30 years as she promotes her tell-all**

**book**

Actress looked amazing

► **Sports Illustrated Swimsuit model Mara Martin, 33, breastfeeds daughter in Rebecca Minkoff's NYFW show - to represent working moms**

► **The Meghan effect! Duchess of Sussex's sold-out bag hits eBay at almost THREE times the price just hours after the launch of her capsule clothing collection**

► **Justin Timberlake and Tiger Woods join forces to raise money for Hurricane Dorian victims**  
The champion golfer took to Twitter

► **Reese Witherspoon reveals son Deacon, 15, is a better driver than she is because she's easily distracted... by dogs**  
Talking to Ellen

► **New book focusing on Jackie Kennedy's years as a reporter is announced on 66th anniversary of First Lady's wedding to JFK**

► **Amber Rose covers baby bump in powder purple sweats while out with beau Alexander Edwards**  
Pair stepped out for lunch in Los Angeles

► **Daisy Lowe reveals her honed legs in asymmetric skirt paired with leather-trimmed blazer as she heads to LFW event**  
Daisy looked gorgeous

► **Khloe Kardashian's little lady True wears cute pink tulle outfit with matching shoes and tote for 'Fashion Week'**  
NYFW is in full swing

► **The fashion world's verdict on Meghan Markle's collection: Experts hail new range as the 'essence of her style' and praise it for being accessible**

► **Serena Williams thanks Meghan for watching US Open final even though it meant leaving Archie - and**

says she 'doesn't know'  
if she could've done it

► Kendall Jenner spent \$600 on ONE sushi takeout order from an upscale Beverly Hills Japanese restaurant Postmates reveals

► Rosie Huntington-Whiteley exudes style in a knitted vest and Jimmy Choo knee-high boots as she steps out in Beverly Hills



► Charli XCX is 'being more honest' than ever as she explores her depression and mental health through music Pop star posed in a series of retro outfits



► Jennifer Lawrence's fiancé Cooke Maroney gallantly gives barefoot actress a piggyback after dinner date Oscar winner, 29, clung on to her beau



**EXCLUSIVE TWO** firetrucks are called to Jude Law's home over 'a false alarm'... as 'relaxed and charming' star is seen chatting to 'giddy' firefighters



► Nina Agdal flaunts her model figure in bike shorts and crop top during NYC workout in a park The 27-year-old enjoyed the late summer sun



► Love Actually star Thomas Brodie-Sangster, 29, makes a quirky style statement as he steps out with girlfriend Gzi Wisdom in LA



► Bella Hadid and sister Gigi enjoy family time with brother Anwar and his girlfriend Dua Lipa while breaking from NYFW duties for dinner



► Game Of Thrones star Rose Leslie cuts a casual figure in a Big Apple top and faded jeans as she grabs a smoothie in North London



► Mick Jagger, 76, cuts a casual figure in baseball cap as he watches cricket game in London... after enjoying night on the town with



mystery brunette



► Happy Days actor Anson Williams - who played Potsie Weber - has filed for divorce from wife Jackie Williams after more than 30 years of marriage



## DON'T MISS

► Kim Kardashian reveals Wyoming could become home someday: 'My husband did just buy a ranch there, and his dream is to move there'

► Rita Ora shows off her sizzling frame and eye-popping underboob in racy black bikini as she poses up a storm during sun-soaked vacation

► Elizabeth Hurley, 54, wraps up in a cozy gray poncho and skinny jeans as she heads out for the day  
Enjoying London's September sunshine

► LeBron James's attempt to trademark 'Taco Tuesday' gets DENIED by US Patent Office because the 'applied-for mark is a commonplace term'

► The Handmaid's Tale author Margaret Atwood defends women's right to work in strip clubs because she thinks it's 'empowering'

► Hayden Panettiere is





caught holding hands with her 'abusive' ex-boyfriend's BROTHER in bizarre new photos  
Pair were spotted in New York City



► 'Most beautiful girl in the world' Thylane Blondeau, 18, flashes her abs in a crop top as she enjoys smitten outing with beau Milane Meritte in LA



► Elsa Pataky, 43, shows off her figure in a tiny bikini as she vacations with husband Chris Hemsworth and brother-in-law Liam on Richard Branson's private island



► Brad Pitt looks in high spirits as he takes to the stage at press conference for new film Ad Astra in Japan after son Maddox broke his silence on relationship



► Kate Moss nails casual chic in a monochrome shirt and black jeans as she steps out in London after attending New York Fashion Week



► Live like royalty! Queen Mother's former 16-bedroom home can be rented for \$6,000 a month - and comes with a billiards room and a gardener



► Kobe Bryant apologizes for shaming daughter's basketball team for failing to win and one 12-year-old girl for choosing dance recital over playing



► Kim Kardashian covers her famous figure in a black leather ensemble while out and about for NYFW  
Wearing a snakeskin top with matching slacks



► That's the nearest she'll get to the REAL Oval Office! Hillary Clinton takes part in bizarre art exhibition sitting behind replica desk reading her emails



► Natural beauty! Queen Letizia of Spain is smart in a chic midi dress and suede heels as she joins King Felipe at an exhibition in Seville



► First look at Meghan Markle's charity clothes collection: Pieces go on sale hours before official launch (and the tote has ALREADY sold



out!)



► The Beatles' secret plan to go out with one last album is revealed in previously unheard tape of 1969 meeting - so was Yoko Ono REALLY to blame for split?

► Meghan Markle says it's been 'deeply important' to work with communities since moving to the UK as she releases unseen photos

► Shawn Mendes and Camila Cabello share VERY sloppy smooch in hilarious video aimed at critics who claim they 'kiss like fish'



**EXCLUSIVE** Janet Jackson cuts a low-key figure as she steps out wearing a wrist support during outing with brother Randy



► Vanessa Hudgens flaunts sleek new tresses while flashing her belly button ring in sexy snaps shared online



► Phoebe Waller-Bridge keeps it chic in a blouse and wide-legged pants as she greets fans during final week of Fleabag theater run in London



► Christina Milian caught her 'first love' Nick Cannon cheating by spying on his cell phone for 'a month' Looked back at her former romance



► Emma Stone flashes her abs in a chic crop top and white pants as she enjoys sun-kissed Capri getaway with a male pal



**EXCLUSIVE** Chris Cornell's widow blasts his ex-wife's demand for child support of her 19-year-old and insists she paid 'every penny' owed



► Spot the difference! Victoria's Secret model Shanina Shaik appears to be caught editing her photos AGAIN to make herself appear slimmer



Awkward



**EXCLUSIVE** Rolling Stones rocker Mick Jagger 76, enjoys night on the town with brunette beauty  
The singer is dating Melanie Hamrick



► James Bond star Daniel Craig, his stunt double and co-star Léa Seydoux continue filming No Time To Die in Italy... with THREE Aston Martins spotted on-set



► Kim Kardashian almost runs into Khloe's ex Tristan Thompson while grabbing dinner with friends in NYC  
But there was a potential for an awkward run in



► Charlize Theron cuts a chic figure in patterned dress while out-and-about with her daughter August  
Enjoyed some mother-daughter time



► Lake Bell opens up about depression battle following complicated home childbirth of son in 2017  
Hospitalized for nearly two weeks



► Farrah Abraham mistakenly calls 9/11 7-Eleven in clip panned by social media users for its carefree tone  
Shot the video at the One World Trade Center



► Jennifer Lopez locks arms with mom Guadalupe amid Oscar buzz for Hustlers during promo blitz in NYC  
Enjoyed a day out together



► Lady Gaga reveals how makeup helped her deal with lifelong insecurities as she admits she 'never felt beautiful' until she discovered the 'power' of cosmetics



► Naomie Harris tells all about traumatic childhood battle with scoliosis... revealing how she had to re-learn how to walk after serious surgery



► John Travolta snaps up stunning \$2.65million Mediterranean villa in Calabasas





The two-story property was built in the mid 90s



► Kim Kardashian sets pulses racing as she slips into barely-there halter top while making her way to The Tonight Show Starring Jimmy Fallon



► Marla Maples appears in episode of *Righteous Gemstones* - which takes a subtle dig at the portrait ex-husband Donald Trump's has hanging at Mar-a-Lago

**EXCLUSIVE** Cardi B flaunts her incredible figure in red corset and barely-there shorts in Indianapolis  
Took the stage at Bankers Life Fieldhouse

► Coco Austin rocks a SPIKED dress as she and husband Ice-T attend *Us Weekly's* NYFW party  
The dress featured a detachable studded skirt

► 'No tears!' Proud mom Lara Trump shares images of son Luke to celebrate his first day of school - ahead of his second birthday on September 12

► Winnie Harlow reveals she uses EYE DROPS on her skin to 'take the redness out' of her white vitiligo patches - as she reveals how she applies makeup

► *BH90210* finale: The show's fate is revealed as relationships crumble and secrets revealed as Denise Richards arrives ahead of cliffhanger ending

► Gigi Hadid is a barefoot beauty in silver mini dress as she walks the Marc Jacobs NYFW show with sister Bella and fellow model Kaia Gerber

► Harry Potter author JK Rowling donates \$18 million toward multiple sclerosis research at center named after her mother Anne who died of the condition at 45

► Fashion designer Betsey Johnson selling pink Malibu trailer for \$1.95M featuring two bedrooms and 'backyard oasis with

soaking tub'

► Kate Middleton has 'found her voice' and has grown from a 'young student' into a 'future queen', royal insiders claim  
Strength to strength

► Bella Thorne wows in a glitzy backless mini as she cozies up to beau Benjamin Mascolo at Oldenburg Film Festival  
Racy ensemble

► Tom Hiddleston enjoys a stroll through Central Park with his spaniel after rumored girlfriend Zawe Ashton revealed she 'wants a baby'  
Taylor Swift's ex

► Kylie Jenner dubs her daughter Stormi a 'celebrity' and expresses that she's the 'only person she wants to collaborate with on makeup line'

► 'I just retired it': Caitlyn Jenner jokes about her penis at Comedy Central's Alec Baldwin Roast bragging it fathered Kylie and Kendall

► RHOA star Phaedra Parks 'will appear' on Marriage Boot Camp with boyfriend Medina Islam  
The attorney has already shot scenes

► Kim Kardashian says she got pee 'all over herself' as she struggled to use the bathroom wearing shapewear... as she discusses SKIMS range

► Selma Blair goes for nautical theme in white shirt and anchor pants with whale motif purse on outing in LA  
Actress, 47, is battling multiple sclerosis

► Justin Bieber and Hailey Baldwin look happy and relaxed at church in Hollywood ahead of 'fairy tale' second wedding  
Still smitten

► Jaime King nails off-duty chic in a black, lace camisole and dark jeans as she steps out make-up free while running errands in West

## Hollywood

► **Kate Middleton and Prince William team up with Richard Curtis for a new mental health project - after director's private meeting with the Duchess**

► **Ashley Tisdale cuts a casual figure in camel dungarees as she carries her pet dog on stroll with husband Christopher French in Los Angeles**

► **Sheryl Crow responds to controversy over her label Big Machine Records and Taylor Swift's masters**  
Has weighed in on the controversy

► **Prince Harry looks in good spirits as he high fives a student during a visit to a school - ahead of Meghan's official return to royal duties after maternity leave**

► **Lil' Kim, 45, commands attention in an elaborate ruched mini-dress and distressed thigh-high boots at US Weekly's NY Fashion Week party**



► **Heidi Klum and husband Tom Kaulitz share a sweet kiss as they touch down in Los Angeles**  
Has officially landed back in the Golden State



► **'I'm so sorry!' Rihanna issues an apology to fans as she admits she won't be releasing a new album any time soon amid fashion launch**



► **Zendaya brings the edge in leather trench coat with black lace slip as she leads the celeb style at the Marc Jacobs NYFW show**  
Looking good



► **Ashlee Simpson gazes adoringly at husband Evan Ross as the couple perform a passionate duet at Boohoo's NYFW party**  
Looked close



► **Jonah Hill rocks graphic t-shirt on stroll in NYC before paying tribute to late singer-songwriter Daniel**



**Johnston**  
Recently got engaged



► **Robin Thicke's fiancée April Love Geary 'at fault' for two-car crash in Malibu** after her vehicle collided with BMW however she 'will not be cited for traffic violation'



► **Miley Cyrus's smitten new girlfriend Kaitlynn Carter flashes M logo ring on engagement finger** as couple leave hotel during romantic New York trip



► **Busy Philipps runs errands in Beverly Hills in patterned sleeveless frock and sunglasses perched on top of her head**  
Relaxed ensemble



► **Elsa Hosk flashes bra beneath sheer dotted top and leather shorts at Boohoo's NYFW bash**  
Was joined by her elusive British boyfriend Tom Daly



► **Selena Gomez keeps it casual in ripped jeans and a black top** as she spends the afternoon in LA with friends  
Was back in Los Angeles



► **Reese Witherspoon hurls ice-cream cones at Big Little Lies co-star Meryl Streep's FACE** as she recreates VERY dramatic deleted scene  
Messy

► **'It's taken such a long time': Renée Zellweger says attitudes towards women in Hollywood have only just begun to change** since Judy Garland's heyday

► **Cindy Crawford keeps her cool in summery snake print dress with flip flops** as she catches up with husband Rande Gerber in NYC  
Happy couple

► **Winnie Harlow cuts a stylish figure in a pink silk shirt** as she arrives for dinner in NYC... days before her makeup collection with Kim Kardashian drops

► **America's Got Talent: Simon Cowell sends 10-year-old opera singer Emanne Beasha to season 14 finals**  
Cast the deciding vote

Wednesday

► **Angelina Jolie's son Maddox briefly breaks his silence on troubled relationship with dad Brad Pitt**

Been almost entirely estranged since 2016

► **Kourtney Kardashian sports dramatic haircut in Christmas throwback photo with her two sisters Kim and Khloe**

Took to Instagram on Wednesday

► **Paris Hilton goes bold in colorful patterned dress as she joins Cyndi Lauper at the punk glam Libertine NYFW runway show SS20 show**



► **Vanessa Hudgens flaunts her abs while going incognito in bucket hat and matching all black outfit**

Back home in Los Angeles



► **Liv Tyler joins Rob Lowe in cast of Ryan Murphy's Texas-based 9-1-1 spinoff Lone Star**  
She's set to play chief paramedic Michelle Blake on the show



► **Jenna Dewan holds her purse tight... two weeks after her \$3K Yves Saint Laurent bag was stolen out of her car by a brazen thief**  
On her way to Pilates



► **Ashton Kutcher broke his toe while picking up his daughter Wyatt: 'I just kinda like, put it back on!'**

Twisted his toe 'in the other direction'



► **Toni Garrn is a leggy goddess as she works her magic in thigh-skimming floral mini dress as she celebrates launch of charitable initiative**



► **Jennifer Lopez says learning pole dancing was 'difficult' while promoting Hustlers on NBC chat show**

The 50-year-old spoke about her new film



► **Natalie Portman stuns in sheer black lace gown at the TIFF premiere of Lucy in the Sky**

Portman stars opposite





Jon Hamm in the film



▶ **Charlie Hunnam cuts a dapper look in a blue suit at the TIFF premiere of True History of the Kelly Gang**

The film made its world premiere Wednesday



▶ **Lady Gaga updates her fans on upcoming sixth studio album with a hilarious emoji-induced punchline on Twitter**

Coming soon



▶ **Sofia Richie sizzles in a tiger print halter top and ripped jeans during an outing in LA**

The star was back home in Los Angeles running errands



▶ **Hilary Duff rocks workout gear as she spends a day in the park with her daughter Banks in Beverly Hills**

Enjoyed some quality time together



▶ **'We just used to make it up': Singer Louis Tomlinson reveals One Direction would spread false rumours about Niall Horan's sex life on tour**



▶ **Tori Spelling shows off her slim waist as she celebrates the BH90210 season finale with BFF Jennie Garth: '30 years in the making'**



▶ **Renee Zellweger recalls how her prosthetic nose broke and oozed glue during Judy kissing scene**

Malfunctioned at the worst possible moment



▶ **Sofia Vergara embraces LA chic as she dons glittery eye tee and wedges out in Beverly Hills**

Modern Family star went Los Angeles chic



▶ **RHONJ's Joe Giudice asked a judge to release him from ICE custody as he fights deportation back to Italy**

Has been fighting the deportation order



▶ **Terrence Howard reveals he's 'done' with acting after the final season of Empire on Fox**

Terence dropped quite the



bombshell



► **Mardik Martin, the screenwriter of Raging Bull and Mean Streets, has passed away at age 82**

Had a hand in writing a number of classic films



► **Suki Waterhouse shows off her sartorial style in a Tommy Hilfiger jumper and red knee-high boots as she steps out during NYFW**



► **Will Smith and Jada Pinkett Smith chat with studio execs as they leave an office building after a meeting**

One of Hollywood's most admired power couples



► **Alaskan Bush People stars Raiven Adams and Bear Brown split just two weeks after revealing engagement**

The couple have called off their engagement



► **Iskra Lawrence shows off her gorgeous curves in a cut-out leopard bathing suit as she hits the Jersey Shore to celebrate her 29th birthday**



► **Hailey Bieber goes biker chic in studded black jacket and jeans as she steps out two days before her first anniversary with Justin Bieber**



► **Witness the fitness! Actress Pia Miller, 35, flaunts her toned midriff in activewear after a sweat session at the gym**



► **Why the new Queen has different coloured eyes from the old Queen: Olivia Colman couldn't deal with piercing blue contact lenses**



► **Daniel Johnston, indie folk singer who inspired the likes of Nirvana and many more, passes away at age 58**

The music world is in mourning



► **Mariah Carey's daughter chooses a Target shopping spree after millionaire mom offers to take her 'anywhere in the world'**



► **AnnaLynne McCord reveals she recovered memories of childhood sexual abuse during PTSD therapy**  
The actress first found fame on FX's Nip/Tuck



► **Zoë Deschanel continues moving on from the end of her four year marriage as she runs errands without her wedding ring**



► **Hana Cross LIKES Brooklyn Beckham's latest post and starts following him on Instagram again... amid claims they have split**



**EXCLUSIVE** **Troubled Britney Spears escapes to Hawaii for bikini break after her family life implodes and new conservator takes over**



► **Kristin Cavallari FIRES her social media manager after star was slammed by fans for snap in plunging dress and tagging brands in 9/11 Instagram tribute**



► **Southern Charm's Thomas Ravenel pleads guilty to assault after being accused of rape by his children's nanny but he AVOIDS jail by paying a \$500 fine**



► **Shay Mitchell will take NO maternity leave after welcoming her first child this fall: 'I love what I do so for me it doesn't feel like work'**



► **Rihanna gives intense performance in black sheer lingerie inside her Savage x Fenty fashion show with Cara Delevingne**



► **Felicity Huffman's lawyers to argue that she should get NO jail time because she didn't mastermind the Varsity Blues cheating scandal as her sentencing looms**



► **Kate Bosworth sets pulses racing in TWO chic outfits in NYC as she promotes her Netflix miniseries The**





#### I-Land

She's starring in a new Netflix miniseries



► Selena Gomez makes a surprise visit to her old Texas middle school and recalls 'eating alone' during lunch  
Hinted that popularity was not always a given



► Kevin Hart released from hospital amid recovery from serious spinal injuries sustained in horror car crash  
Will be taken to a live-in physical rehab facility



► Johnny Cash's daughter Rosanne talks about her famous father's affair with June Carter: 'It was so painful for my mom'



► Transgender model at the center of bitter RHONY controversy slams Sonja and Dorinda's 'damaging' comments about her body



► Elle Fanning flies under the radar in black knit and boyfriend jeans as she steps out in London

Elle was spotted out and about in Soho, London



► Did Gwyneth Paltrow pose naked on Instagram? Goop teases followers with image of NUDE blonde woman - and she looks JUST like the star



► Classic beauty! Dennis Basso was inspired by his extensive personal collection of blue and white china for his spring 2020 collection



**EXCLUSIVE** Gwyneth Paltrow invited Harvey Weinstein to parties, and thanked him for appearing in her TV special, emails reveal



► Carol Alt, 58, proves she still has model legs as she raises funds for 9/11 event... nearly 40 years after her Sports Illustrated cover



► Pictured: Former Survivor producer Bruce Beresford-Redman who was convicted of killing his wife is spotted holding



his mom's hand back home in California



► **Cardi B proudly pours her curves into cat suit at Rihanna's NYFW show after defending her plastic surgery**  
The 26-year-old rap star showed off her figure



► **Sophie Wessex is the Queen's 'favorite' and is like 'another daughter' who's 'trusted in ways Camilla and Kate Middleton aren't', royal insider claims**



► **Nick Jonas, 26, fans call him 'gross and irresponsible' after singer holds cigar on the cover of smoking magazine**  
Receiving backlash



gross and irresponsible as a singer and a human raised knowing the health risks but okay

► **Queen Maxima of the Netherlands oozes glamour in an elegant blue gown as she joins husband King Willem-Alexander for dinner at Noordeinde Palace**



► **Michael Phelps celebrates the birth of his third son with wife Nicole in sweet family photo shared to Instagram**  
Tot is called Maverick



► **Kristen Stewart strolls hand-in-hand with new girlfriend Dylan Meyer on romantic LA outing**  
KActress was spotted locking palms with her rumored new love



► **Dua Lipa puts on a quirky display in neon ensemble with boyfriend Anwar Hadid at Marc Jacobs NYFW show... after enjoying a passionate kiss**



► **Prince Harry 'twins' with Meghan Markle and breaks royal tradition by shutting his own car door - a year after the Duchess was praised for the same move**



► **Lori Loughlin displays a rare light mood as she wears a 'positivity' shirt while giving a thumb's up... as college admissions scandal fate looms**




















► [Patti Hansen, 63, looks impossibly youthful at the Michael Kors show... almost 50 years after she launched her supermodel career](#)

► [Donald Trump and Melania lead 9/11 commemorations at the White House and Pentagon while relatives of victims gather at Ground Zero](#)

► ['I won't talk about Trump in front of my kids but he's an a\\*\\*\\*\\*\\*e': Chrissy Teigen continues her feud with president as she blasts him on Shake Shack run](#)


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# EXHIBIT 5



# British diver recalls Thai cave rescue: 'Are we heroes? No'

By Rebecca Wright and Hilary Clarke, CNN

Updated 9:44 AM ET, Sun July 15, 2018



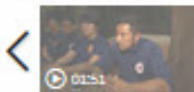
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Thai cave rescue: 'I told them, don't lose hope.'



See moment Thai boys get released from hospital



Video shows Thai boys' rescue from cave



CNN report inside Thai cave

**Chiang Rai, Thailand (CNN)** — A British diver who first discovered 12 schoolboys and their coach stranded on a ledge in a flooded cave in Chiang Rai, in northern Thailand, has described the moment he first saw them -- and played down suggestions he was a hero.

Retired fireman Rick Stanton and fellow diver John Volanthen found the children deep within the cave nine days after they went missing.

Stanton was speaking at a news conference at Heathrow Airport outside London Friday, alongside fellow British divers Josh Bratchley, Chris Jewell and Connor Roe, Irish diver Jim Warrny and cave rescuers Mike Clayton and Gary Mitchell.



Divers and rescuers from the Thai cave mission arrive at Heathrow Airport Friday. From left to right: Chris Jewell, Mike Clayton, Rick Stanton, Lance-corporal Connor Roe, Josh Bratchley, Gary Mitchell and Jim Warrny

When asked how they felt when they discovered the young football team alive in the Tham Luang cave complex, Stanton replied: "Initially, of course, excitement, relief that they were still alive. As they were coming down the slope, we were counting them until we got to 13. Unbelievable," he said.





Richard Stanton, left, and John Volanthen arrive in Mae Sai, Chiang Rai province, in northern Thailand, Tuesday, July 3.

"We gave them a little bit of extra light, they still had light, they looked in good health. Then, of course, when we departed, all we could think about was how we were going to get them out. So there was relief, tempered with uncertainty."

He declined to go into detail about how his team rescued the children, saying it was "too detailed for this point in time."



Rescue personnel carry a member of the "Wild Boars" Thai youth football team on a stretcher during the rescue operation inside the Tham Luang cave.

"The most important thing to have was a full face mask which had been applied inside with positive pressure to enable them to breathe and to be relaxed enough so not to feel any anxiety during the process," he said.

"There was a lot of chaos but we were so task-orientated, focused, and we blanked that out and carried on with the job in hand, step by step, until we achieved success."

"Are we heroes?" he said. "No, we were just using a very unique skill set, which we normally use for our own interests and sometimes we are able to use that and give something back to the community."

Jewell said the diving conditions "were extremely challenging. There was poor visibility and responsibility for another human being's life."

"The Thai authorities took a lot of steps to divert rivers on the mountaintop which we believe bought us as lot of time to get this outcome," he said.

Former Thai Navy SEAL Saman Kunan died during the operation while replenishing oxygen canisters.

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#### News & buzz



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Barr: Appalled and angry over failures to secure Epstein

## British diver helped pinpoint boy's location

British caver Vern Unsworth, 63, who lives in Chiang Rai, was instrumental in linking up the Thai authorities with the British experts. "I was actually scheduled to go into the cave on June 24 anyway," Unsworth told CNN in an interview in Thailand. "I got all my gear ready, and I was going in to do a solo trip just to see what the water levels were like. And I got called out at 2 o'clock Sunday morning, and I was there for the whole 17 days."

Unsworth's role in the rescue was also pivotal because of his intimate knowledge of the Tham Luang cave system, which he describes as his "second home" after spending the past six years exploring it.

He had been involved in cave rescue operations in the UK before, but "nothing on this scale."



**Related Article:** The Thai cave rescue ended in success. But only two weeks ago, it all seemed hopeless

It was Unsworth who initially pinpointed where he thought the Wild Boars team would be waiting. They were found 200 meters away from that point, which was "probably around about the best place they could have been," he said.

The flooding of the cave could not have been predicted, he said, as the floodwater had come through three to four weeks earlier than last year.

"These kids were just totally unlucky. Wrong place, wrong time," he said. "It happened very quick. You can't

blame the coach, you can't blame the kids."

## Race against time

In the early days of the search operation, Unsworth said he quickly realized that outside expertise was required, and advised the Thai authorities to bring in specialist cave divers who had dealt with similar rescues in the past.

"It was a race against time," he said. "They needed world class divers and that's what we got."

He was the first one to suggest calling for help from Volanthen, Stanton and Robert Harper -- who arrived a few days into the search on June 27.

"(They went) straight into the cave," Unsworth said. "That's when things started to really happen."

**RELATED:** The Thai Cave Rescue Ended In Success. But Only Two Weeks Ago, It All Seemed Hopeless

Unsworth described how after the euphoria of finding the team, the reality set in of the seemingly impossible task ahead: getting them out of the cave.



Just getting to the dive start point was proving to be very difficult," he told CNN.

"You get to a stage where only 200 meters into the cave you hit what we call a sump where the water meets the roof," he says. "So that was making it difficult anyway to get into the system, never mind start from the diver point, which was chamber three."

A few days later pumps were brought in to start taking water out of the cave, which along with the low levels of rain that week, helped to lower the water levels as much as possible. But when heavy rains were forecast, the deadline approached for the rescue to begin.

"It got to a point where we knew that the weather forecast wasn't going to be too brilliant," he says. "We said we have to get in."

## Boys sedated

The complexities of the cave diving and the dangerous route the divers had to take with the boys -- many of whom don't swim -- meant they decided to sedate the boys so they would "stop panicking" during the rescue, Unsworth says.

"It was the only way," he said. "Some of these kids couldn't swim and they'd been put into cold water with wet suits on and full face mask, (which is) alien to them."

He added that this would also reduce long-term psychological damage because they won't remember the actual rescue.

The next challenge, Unsworth said, was coordination between all the different groups including the Thai Navy SEALs and international volunteers.

"They had never been involved in anything like this," he says. "I think it was just communication. It was difficult at times. Sometimes things got misinterpreted."



Members of the Royal Thai Navy are pictured with the 12 schoolboys, members of a local soccer team, and their coach, who were trapped in the Tham Luang Cave network in Northern Thailand.

Unsworth said he expected a "high rate of attrition" in terms of the the boys' survival, but added that hopes increased after the first day of the rescue.

"Sunday was when the first four came out and they were all strong and nothing really to worry about them," he said.

"It gave us hope for the next four and the next five," he says, especially after the "very sad" death of Kunan.

The worsening weather added to the concerns among the rescue teams.

"The last day was the worst day," Unsworth said. "The third day you have to get five out, plus four Navy SEALs, and the weather is changing quite rapidly. The water levels did come up on the Tuesday. You could see it happening. You could feel the tension."

Chatting to CNN in a leafy café north of Chiang Rai, Unsworth appeared exhausted physically and emotionally, and is still reeling from the outcome of the rescue.

"Just to get any of them out alive would have been a miracle. But to get 13 out of 13 ... won't happen again," he says. "(It's the) biggest miracle ever."

CNN's Patrick Sarsamak contributed to this report. Rebecca Wright reported from Chiang Rai and Hilary Clarke wrote from London.

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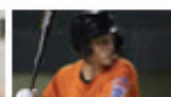
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# EXHIBIT 6

THAI CAVE RESCUE

# Exclusive interview with Thai cave rescue hero Vernon Unsworth: 'If the Brits hadn't been called in, it would have been too late'

The UK caver who drafted in fellow experts and helped plan the rescue of the 12 Thai boys reveals disaster was very near

Philip Sherwell, Mae Sai

July 15 2018, 12:01 am,  
The Sunday Times

Media

Australia



Clockwise from top left: Pornchai Khamluang, Prachiak Sucham, Panumas Saengdee, Chanin Wiboonrueng, Phipat Phori, Mongkol Boonpiem, Duangphet Promthep, Ekkapol Chantawong

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Inside the dark, dank labyrinth of the Tham Luang cave complex, the churning waters were rising as heavy rains lashed the northern Thai beauty spot.



For Vernon Unsworth, a British cave explorer who knew the subterranean complex better than anyone, it was clear that time was fast running out to find the 12 young footballers and their coach.

The 63-year-old financial broker, who acquired his love of potholing in the Yorkshire Dales but now lives near Tham Luang, was the first foreign rescuer at the scene, arriving the morning after the team disappeared.



Clockwise from top left: Adul Sam-on, Nuthawut Thakamsong, Peerapat Sompiengjai, Ekkarat Wongsookchan, Sompong Jaiwong

Three days later, there was no prospect of a breakthrough.

The surging waters were thwarting Thai navy SEALs divers who lacked cave know-how or equipment to combat the perilous conditions, narrow jagged passages and zero visibility.

“The search was going nowhere, the conditions were worsening by the hour and we had no idea where the boys were,” said Unsworth, who has spent several years charting Tham Luang’s hidden world.

"We needed the expertise of top world-class cave divers to look for these kids and we needed it fast. If we hadn't called them in then, it would have been too late."

Unsworth tapped a British number into his phone and passed the device to a senior Thai official. At the other end of the line was his friend Rob Harper, who had just returned to Britain after completing a Tham Luang exploration trip with Unsworth and had put on standby two of the world's best cave dive rescuers, John Volanthen and Rick Stanton.



John Volanthen, one of the British divers who found the boys, leaves Tham Luang cave with his full kit  
LINH PHAM

Within 24 hours, the trio had flown in to join Unsworth. For the next two weeks, the unassuming Britons masterminded a daring search and rescue mission that transfixed the world, with its inspiring mix of international co-operation, ingenuity, determination, bravery — and, ultimately, joyous success.

The ranks of Thai special forces personnel, serving and retired, were bolstered by Australian federal police units, American para-rescue airmen, a Chinese dive unit and an array of civilian divers who arrived with cave rescue kit from around the world.



Just as crucial to the operation were the volunteer Thai engineers and pump operators who arrived to divert and lower waters that had been so rapidly filling the caves.

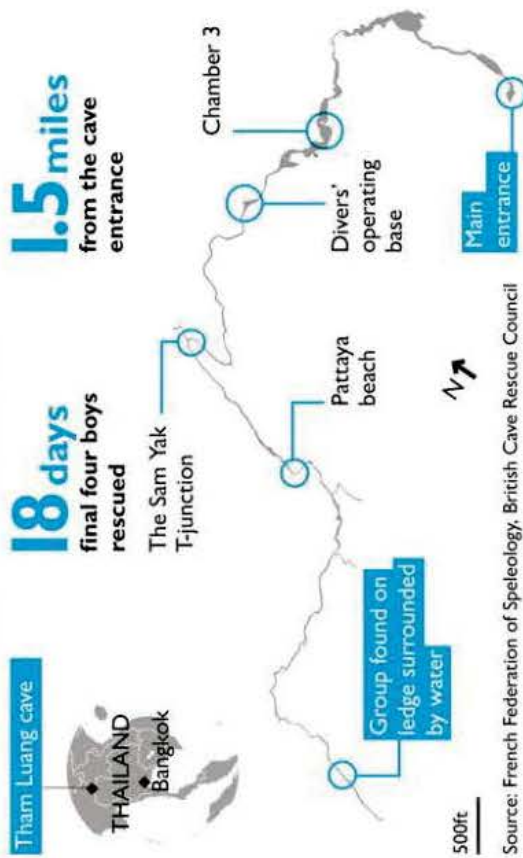
Meanwhile, the mission's British architects plotted their operations with the help of surveys of the seven miles of Tham Luang drawn up by Unsworth and Harper. The first priority was as clear as it was daunting: simply to locate the 13.

Unsworth knew that some of the chambers where they might have sought refuge would by then have been completely flooded.

"If they'd been caught in the wrong place, they'd have stood no chance," he said as he reflected on the operation. "By the time John and Rick arrived, conditions were terrible and much of the cave was totally inaccessible."

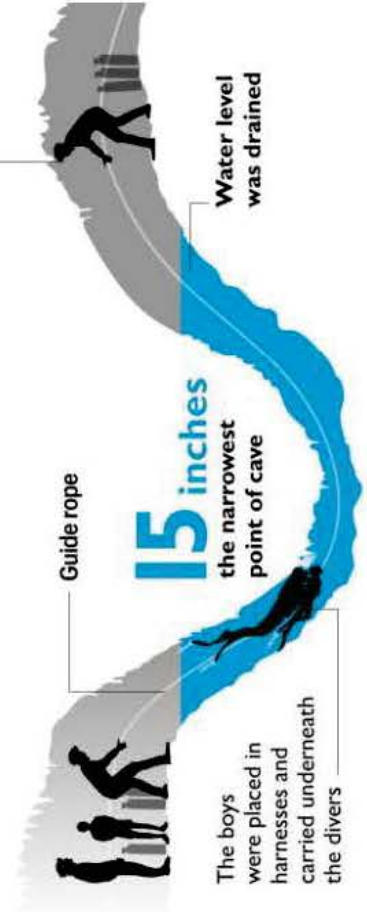
It took another five days for Volanthen and Stanton to find the boys and their coach, sheltering on a muddy ledge, within 200ft of the location Unsworth had predicted was their most likely refuge. Volanthen told the BBC that as they emerged from the murky waters, they first detected the presence of the boys and their coach by sniffing the air.

## HOW THEY GOT THE BOYS OUT



The 12 Thai boys and their football coach were checked by Australian doctor Richard Harris before being swum out. They were sedated

Divers provided support along the route, carrying spare oxygen tanks





Even amid that elation, the scale of the next challenge was emerging — how to extricate them from the mountain. But as the team plotted the rescue, Mother Nature offered some help.

The downpours eased for five days, giving the pumping and siphoning teams a valuable opportunity to lower the water levels. “We were lucky with the weather, that’s for sure,” said Unsworth. “But we knew that the rain was forecast to return last weekend and we couldn’t leave those boys down there any longer. So we had our timeframe.”

Narongsak Osatanakorn, the provincial governor in overall charge of the operation, announced that the rescue mission would be launched on Sunday.



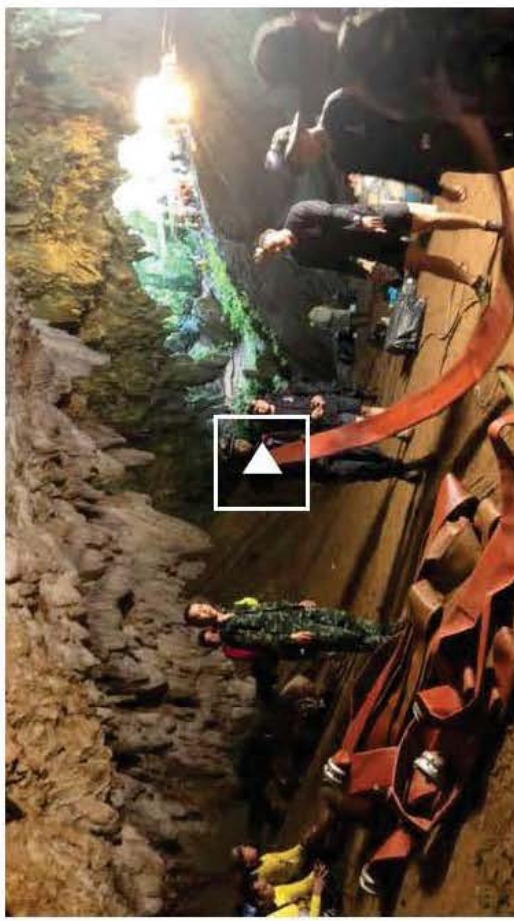
Volanthen and Stanton led a team of 13 foreign divers — including five fellow volunteers from Britain, two Australians and four Thai-based Europeans — as well as five Thai Seals who ferried the 12 boys and their coach to safety over three perilous days.

Osatanakorn had reported that the boys were being given a crash course in using scuba gear. But a captivated world still wondered how the 13, none of whom had any diving experience and several of whom could not swim, would cope with such a dangerous exit, particularly in the wake of the death of a Thai diver.

It has since emerged that they did no diving. The boys were heavily sedated, described by one source as being “not aware of what was happening”, then strapped into a cradle stretcher known as a “skid”. Rescuers could not take the risk that they would panic or thrash around in terror.

Richard Harris, the Australian doctor who stayed with the boys in the cave for the three days of the rescue and was responsible for sedating them, said the decision to “swim the players out” was made when “all other options were exhausted”.





The desperate search for the lost boys

On Facebook, he wrote about the “immense” pressure on the divers who “never dropped the ball for a second”. For several submerged stretches, totalling about half a mile, they were carried underwater by divers following guide-ropes, the sedated boys breathing through full-face masks attached to air tanks.

Then after being squeezed through the most dangerous chokepoints just before Sam Yak, the cave’s now notorious T-junction, the stretchers were passed to rescuers in chambers where the waters had been temporarily reduced to wading levels by the intense pumping operation.

Unsworth, who is not a diver, was among the teams that carried stretchers during the three-day operation. After 17 long days at the scene, he was among the last to leave the cave on Tuesday night, shortly before waters roared back through the tunnels after the rains returned and a pump failed, a salutary reminder of how easily the riveting success story could have ended in disaster.



"We could hear the water coming. It was time to get out and everyone was moving pretty briskly," he said, with typical understatement, of an episode that others described as a frantic scramble for safety.

Unsworth brushed off suggestions that the coach had been foolhardy to take his players to the caves at the start of Thailand's rainy season, just a week before the site is supposed to be off-limits for the monsoon. "Nobody's to blame, not the coach, not the boys. They were just very unlucky," he said, noting that the complex had flooded several weeks earlier than previous years. "It wasn't just the rain that day, the mountain is like a sponge and waters from earlier rain were raising the levels."

Indeed, Unsworth said that he had been planning to make a solo venture into the complex on the Sunday when he instead received the call saying the boys were missing there.

"I think that I would have spotted the warning signs of rising water levels, but there's certainly no blame to attach," he said.

The perils of the mission were tragically illustrated when a former Thai navy SEAL died in a diving accident on July 6 after his tank ran out of air. Saman Kunan, who was in his late thirties, was part of a team of former military and commercial divers who volunteered to assist the operation.

Tim Acton, a British businessman based in Bangkok, joined their ranks last week, bringing in air tanks and supplies to place along the route and helping to carry out the stretched evacuees.



He described scenes of euphoria mixed with exhaustion on Tuesday evening as four Thai Seals who had stayed with the boys left the cave after the final rescue. "Everyone was cheering and applauding and slapping these guys on the back as they emerged," said Acton, 39, a dive-master who has also worked as a commercial diver.

"The conditions for the rescue divers were incredibly tough and inhospitable — rushing water, no visibility, narrow holes, lots of sharp rocks. It was an extremely hostile environment, even for cave divers of their experience and talent. It's amazing what they achieved. Saman's death simply made everyone all the more determined to make a success of the operation. We'd talked about how some people don't come home from a mission like this, but the atmosphere was of incredible professionalism and focus on the task.

"Even when you know that you can get out at the end of each day, it's a dark cold challenging place to be. You couldn't help thinking about what those kids must have been going through in there, not even knowing if they'd be found."

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J

JEM

16 JULY 2018

What is it with these billionaire Americans? Musk makes batteries, blows up rockets, wastes money and clutters space with useless rubbish. Why not sue him for defamation? You can be sure US lawyers would lick their lips at the prospect.



Reply



4



Recommend



Report

M

MouseParty

15 JULY 2018

Just on an tangent, but that weirdo guy Elon Musk, who tried a PR stunt with the Thai boys rescue, has just called one of our magnificent dive experts a 'pedo', because he had the audacity to call Musk out. What is wrong with him?



Reply



22



Recommend



Report

R

Romulus

15 JULY 2018

MouseParty

MouseParty Why did Mr. Unsworth elect to so savagely "call Musk out" over his offer of assistance? Was Mr. Unsworth jealously guarding his share of fame?



Reply



Recommend



Report

D

DK

15 JULY 2018

MouseParty

Romulus MouseParty Do you think Musk calling the diver a paedo was an appropriate response? I'm eagerly waiting for the announcement that billionaire Mr Musk has set up trust funds for the survivors and the family of the dead diver.



Reply



5



Recommend



Report

M

MouseParty

16 JULY 2018

MouseParty

Romulus I do not think so. If some guy turns up spouting all sorts of illogical rubbish, just to tout his engineering prowess, and get great PR for his failing company, then being called out is a totally acceptable response. The professional divers did not have time to bolster Musk's ego. His plan was ludicrous!



Reply



5



Recommend



Report

R

Richard James 15 JULY 2018

So to all those posters who days earlier insulted me for congratulating the two British divers who found the boys, will I be getting an apology now? Well I'm not holding my breath, because the often self inflicted, Brit-bashing seems to be a way of life now.

Reply

14 ☆ Recommend

Report

M

Mrs Miggins Husband 15 JULY 2018 | Richard James

Britain has led the world in cave diving exploration and rescue for decades. I've no idea why anyone would have sought to diminish their very obvious principal contribution. You are right that it makes you wonder why people are so quick to denigrate British achievements.

Reply

17 ☆ Recommend

Report

M

Mabelino 15 JULY 2018 | Richard James

A whole range of people were responsible. The divers couldn't have done it without them. And think of those poor farmers who have had their livelihoods devastated by the flooding from the caves. They are the unsung heroes in all this too.

Reply

3 ☆ Recommend

Report

P

Paul Ainsworth 16 JULY 2018 | Richard James

The Jafa Also other niche rescue capability.

Reply

☆ Recommend

Report

A

Appeasementisfatal 15 JULY 2018

Thank God.

Reply

4 ☆ Recommend

Report

M

Mrs Miggins Husband 15 JULY 2018 | Appeasementisfatal

Ok, but thank the rescuers maybe first.

M

Mrs Miggins Husband

15 JULY 2018 | Appeasementisfatal

Ok, but thank the rescuers maybe first.

Reply 7 ☆ Recommend

Report

M

Mabelino

15 JULY 2018 | Appeasementisfatal

No God!

Reply ☆ Recommend

Report

J

Jeff Crawford

16 JULY 2018 | Appeasementisfatal

Mabelino True, there is no God!

Reply 2 ☆ Recommend

Report

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Jeff Crawford 16 JULY 2018 | [Appeasement is fatal](#)

Mabelino True, there is no God!

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# EXHIBIT 7

# The Thai Cave Rescue: Miracle At Tham Luang

*Condé Nast*

**Six days after** the miracle, when the boys were cocooned in a sterile hospital and the divers had flown home and almost all of the journalists had dispersed, people came to the cave again. There were villagers from the flatlands beneath the Doi Nang Non, the mountains that rise between Thailand and Myanmar, and there were volunteers, hundreds of them in their lemon yellow shirts and sky blue caps, who had been there for most of the 18 days the miracle had required. There were monks, too, at a makeshift dais on the footpath to the cave, and there were dignitaries—local authorities, the families of the boys who'd been blessed by the miracle—in rows of chairs under a long tent.

The people, many of them, brought offerings. Below the mouth of the cave and in front of the big sign that announces the place as Tham Luang-Khun Nam Nang Non Forest Park, in a clearing cut into the dirt at the side of the road, they planted small white pennants and sticks of incense and candles the color of goldenrod. On a table near the monks, they left fish and fruit and the severed heads of pigs.

These were gifts to the spirit of the cave. For almost three weeks, Tham Luang had held within her a dozen young soccer players and their coach, who were trapped by flooding rains without food or water or any possible way to remove themselves. For most of that time, it also was assumed, if rarely spoken aloud, that some of those boys—perhaps all of those boys—could die.

The miracle was that they did not.

Family members.

Sakchai Lalit

And so the people came early in the morning, trudging up the park road from the police checkpoint, and they continued coming until the afternoon, and they stayed until nightfall. The dignitaries sat silently in their chairs, and the monks chanted, monotone and rhythmic, and the volunteers filled in the empty areas where the journalists and the food stalls and the electrical feeds had been days before, all of them facing the monks on the dais. They stood for hours, only occasionally kneeling, as if a field of enormous yellow flowers with pale blue centers had risen from the mud and the gravel, all of them together in the green of the forest and the steamy heat of July, under a sky heavy with clouds but leaking only a light and misty rain.

They were making merit, and they were thanking the spirit of the cave for the miracle she had allowed and atoning for the indignities inflicted upon her—the miles of hose and rope and cable run along the limestone, the endless boot prints in the mud, the lights and the noise and the chaos—in creating that miracle.

The boys and their coach had been deep inside the cave, beyond miles of chambers



and sumps and boulder chokes. It is not unthinkable (though it is horrifying to dwell upon the thought) that they would not have been found until November, after the monsoons had passed and the water had receded and all of them were dead.

Even after they were found, rescuing them was by no means certain. To extract exhausted and weakened boys through a black labyrinth of mud and swirling water was technically daring, physically improbable, and logistically overwhelming. Yet dozens of people with specialized, almost esoteric skills traveled from around the world to do so, to try to save 13 strangers of no particular import other than being fellow humans. Those dozens were supported by many hundreds more, the volunteers in yellow and blue, the colors of the King and Queen Mother, who cooked and cleaned and kept order; and by holy men who chanted and meditated and communed with the spirit of the cave. And millions upon millions watched, fed live updates by many hundreds of journalists staked out at the foot of the Doi Nang Non.

Until finally, 18 days after going in, they were out, all of them, 12 boys and one coach. The rescuers succeeded, or the cave relented, or maybe both happened at once. No one can say for certain, and perhaps it doesn't matter: It was a miracle either way. Six days later, after most of the foreigners had gone home and the garbage was being hauled away and the tents were being broken down, it was possible to imagine this place returning to what it always had been, a quiet clearing next to a quiet cave. But it still quivered with a sense of the extraordinary, and so it was proper to make merit in such a place.

Volunteers gathered from all over the world.

Tyrone Siu

---

**The team was known** as the Moo Pa, a name that translates literally as “Forest Pigs” but also, more reasonably, as “Wild Boars,” and they practiced on a rough field across the road from a little church and a small sundries shop. There were at least 13 players at practice that night, the youngest 11 years old, the oldest nearly 17, one turning 16 that very day, which was Saturday, June 23. Practice was run by their assistant coach, Ekapol Chanthawong. Coach Ek is an orphan who trained to be a Buddhist monk and even then, as a grown man of 25, lived as a caretaker of sorts at Wat Phra That Doi Wao, a temple at the top of a steep mountain that, if you tottered over the side of the road, would dump you into Myanmar.

The summer sky was still thick with golden light when practice ended. It was early and the boys had a little time before they had to be home. Twelve of them and Coach Ek decided to ride their bicycles to Tham Luang. Though some of the boys, maybe most of them, knew their parents might not approve, this was not a reckless adventure. The cave was neither far nor isolated—coming south from the scrappy border town of Mae Sai, you turn right just before the Toyota dealership and follow the road through a cornfield and a grove of fruit trees—and part of it had been properly tamed for tourists. It is, in fact, an official state park that includes several other caves worn into the Doi Nang Non. There is a sizable parking lot a hundred meters past the entrance and proper toilets and a ranger station from which park personnel during the dry season give tours of the first kilometer or so of the cave.

On the footpath from the parking lot, as a matter of cultural habit, there is a shrine to Jao Mae Nang Non, the spirit of the cave. She is represented by what appears to be a recycled mannequin in a pink dress, but in the traditional lore, she was the princess

of an ancient kingdom who fell in love with a stable boy. Like most ancient stories of royalty and commoners, this one ended badly: Her father's soldiers killed the stable boy, and, in her grief, the princess stabbed herself to death in the cave. The stream that runs through the cave is believed to be her blood, and the mountain is said to have taken her shape; the full name of the place, by one translation, is "cave of the lady who lies waiting," and the mountain, from the right perspective, does indeed resemble a woman in repose.

It is a majestic cavern, at least at the opening, a high and wide pocket eroded through the limestone. There is a well-worn path from the mouth, poured with cement in parts, and beyond that, Tham Luang narrows before opening again into a series of chambers. Even two kilometers in, when the cave constricts to a mud-floored passage, it's still wide enough and high enough for a grown man to comfortably walk.

The Wild Boars had no difficulty getting fairly far in, crawling through a couple of choke points to the open spaces. And they expected no difficulty getting back out. The heavy monsoon rains weren't expected for another week, and the year before, the cave hadn't begun to flood until the middle of July. The team brought no food or serious spelunking gear because they were there on a lark, a brief field trip. They planned to stay for perhaps an hour, then retreat, and pedal home to their parents.

But, as it can do in northern Thailand in the middle of summer, it started to rain. The Wild Boars wouldn't have known that at first, with a couple thousand feet of rock above them and their being more than a mile from the open forest. But water fell on the mountains and gathered into streams that disappeared into sinks, rushing down through the limestone into the voids below. The water rose suddenly and quickly, a great volume forced into a tight course. A low area behind the boys and their coach flooded, filled a narrow spot in the tunnel the same way water settles in the trap of a sink. Coach Ek tried to swim out, to see if there was a reasonable chance for the boys to follow, but was forced to turn back. More water came, and the Wild Boars retreated farther, scrambling up—the interior of the cave is not level, but rather rises and falls as it burrows into the mountain—to a chamber with a sandy patch called Pattaya Beach, then down again and up again, eventually reaching an even higher spot beyond. They settled on a mud slope above muddy water.

And then they waited, first for minutes. The water did not recede. And so they waited for hours, because there was nothing else to do.

---

**Boys didn't come home**, and parents began to worry. They made phone calls and sent text messages—to the head coach, to other parents—until, according to *The Washington Post*, the coach reached one boy who didn't go to Tham Luang after practice. The coach went to the cave and parents went to the cave, and they found bicycles at the mouth and impassable water inside. The Wild Boars obviously were trapped in the cave, but no one knew where exactly or, more to the point, how to get them out.

But then the first little miracle transpired, which could probably be dismissed as coincidence if it weren't for everything else that happened.

An hour south, near the city of Chiang Rai, lived a man who knew the innards of Tham Luang better than anyone else on the planet. His name is Vernon Unsworth, a 63-year-old British hobbyist who'd learned to spelunk long ago in the Yorkshire dales and who now lives part of the year in Thailand. That cave, he would later tell

reporters, had been “my second home” for more than half a decade: He had gone farther and deeper than anyone before him and had taken extensive measurements and notes; his explorations, in fact, are the basis for some of the section on Tham Luang in *The Caves of Thailand, Vol. 2*, a book by Martin Ellis published the previous year.

As it happened, Unsworth had his gear ready to explore the cave the very next day, June 24, just to have a look around and check the water levels. One of the local authorities who knew Unsworth's work called him, and Unsworth hustled up to the cave in the middle of the night. Because of his expertise, he understood two things immediately, both of critical importance. The first was where to look for the Wild Boars, a crucial decision considering that the cave is enormous and time was precious. About two kilometers from the mouth of Tham Luang, there is a junction. To the right is a “passage [that] soon becomes a crawl, which is flat out in places and often remains flooded in the dry season,” according to Ellis's book. Instinct and necessity, then, would have sent the Boars left, toward Pattaya Beach.

The second important thing Unsworth understood was that divers would be required, and that ordinary divers weren't sufficiently skilled. (Even Thai SEALs couldn't get far at first.) Cave diving—swimming through tight tunnels full of sharp rocks and strong currents in near total darkness—is extraordinarily specialized and wildly dangerous, so much so that it isn't even included in most naval dive training; the risk simply isn't worth the benefit. But Unsworth, being a spelunker himself, knew of divers who were qualified, and he gave the authorities three names: Rick Stanton, John Volanthen, and Robert Harper, all of whom work with the volunteer British Cave Rescue Council.

Unsworth told the Thais to contact the three through the British embassy. They were at the cave by 7:30 p.m. on Wednesday.

Thai forest rangers.

RUNGROJ YONGRIT/EPA-EFE/REX/Shutterstock

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**The rain mostly held** off on Sunday, but then fell hard on Monday and Tuesday, too—water pouring from the sky and into the streams and down through the sinks. Deep in Tham Luang, the Moo Pa had no food, and the water below them was muddy, undrinkable, so Coach Ek pointed to the stalactites growing from the ceiling, relatively pure water dripping off them. And the boys decided to dig, using rocks to scrape at the walls. It was futile to think they could tunnel their way out, but even in futility there could be hope.

More important than the presence of hope, though, was the absence of panic, and the conservation of energy. Coach Ek had been a practicing monk for ten years, during which, like most monks, he'd learned how to meditate. There is a difference, of course, between devout and dedicated religious meditation and staving off terror in the damp dark of a cave, but the idea is the same. Coach Ek taught the boys to breathe slowly and purposefully, to clear their minds, to remove themselves mentally and emotionally from a muddy slope. Done properly—and the boys would later say their coach was an excellent teacher—the heart rate slows and metabolism downshifts and panic quells. That probably was more effective than digging.

Outside it was still raining, great torrents at times, a slow drizzle at others, and always a threat of more, even when the clouds broke over the Doi Nang Non. But rescuers

and volunteers continued to arrive, hundreds of them—Thai military and civil authorities, Americans and Australians, expat divers from the resort islands in the south—and they knew they had to get at least some of the water out of the cave. Far above, streams were diverted to slow the flood going in, and massive pumps sucked out millions of liters, steered a deluge into rice paddies brilliant green with maturing plants.

“It was like two cups pouring into one,” said Setthavut Panyakham, the head of the village of Ban Nong O. The rice farmers there knew the flood was coming, knew it would drown their crop, knew they couldn't re-plant until next year. But they did not protest; of 19 farmers, only four even asked for the compensation that the government offered.

“It's about giving,” Panyakham said. Making merit, he says, is also about not asking for money for doing the right thing. Instead of fretting about their destroyed livelihoods, the villagers in Ban Nong O brought food to the cave and washed clothes for the rescuers and directed traffic to keep all the volunteers and more than a thousand journalists from tripping over each other and gridlocking the roads. He beamed when he said this. “The people,” he said, “were able to show their spirit.”

---

**Divers began making** forays into the cave, fighting hard currents, laying ropes to mark the way. They all turned left at the junction, as Unsworth had suggested, moving deeper into the cave with each expedition.

On July 2, the ninth full day of the operation, Stanton and Volanthen made it all the way to Pattaya Beach, the sandy rise more than two kilometers in. They surfaced. No Wild Boars. They still had some rope left to lay, so they continued on, through a sump—a low spot that fills with water—that required them to swim through a narrow tunnel beneath low-hanging rock before they surfaced again. They sniffed.

Thirteen people confined in a small space with limited airflow will, as a matter of biological certainty, create a stink.

Volanthen smelled people.

From the slope, the boys saw muted light through the murk of the water that brightened when it broke the surface. Adul, 14 years old and one of the couple who spoke English, edged to the water.

“How many of you?” Volanthen asked.

“Thirteen,” Adul answered.

“Thirteen? Brilliant.”

The boys and their coach wanted to leave.

“No, not today,” Volanthen said. “There's two of us. You have to dive. We're coming. Many people are coming. We are the first. Many people come.”

And many people did come. The next day Thai SEALs ferried food and water and blankets to the Wild Boars, and three of them, along with a military medic, stayed with the team.

But the Wild Boars still had to be brought out, and no one was quite sure how that would happen. Or even if it could happen.

---

**The families of** the Wild Boars never left the park. They were secure in their own area, separate from the legion of journalists who filled the parking lot, and they napped on cots and in plastic chairs while they kept vigil. On occasion, monks would come to pray with them, including, at least twice, a forest monk by the name of Kruba Boonchum Yannasangwalo. He is 53 years old, revered in parts of Thailand, Myanmar, and Laos, and somewhat of a celebrity, as far as monks go: A souvenir stand at the temple where Coach Ek lives sells bracelets purportedly woven by him. (It also sells consecrated Phra Ruang Lamphun amulets, which are said to protect the holder from harm, and one of which Coach Ek wore around his neck. They have since become a very popular item.)

Kruba Boonchum came to the cave after a woman he did not know, and who did not know him, claimed to have had a dream about the cave. In it, the woman wrote on Facebook four days after the Wild Boars went missing, the spirit of the cave visited her and said she would not release the boys until Kruba Boonchum came to pray. So he came on Friday, June 29, and meditated and prayed. “Don't worry,” he announced. “The boys are safe. They will come out in a few days.” He prayed and meditated the next day, too, after which he said, “The SEAL divers are not far from the boys.”

Which was true, except it was Brits and not SEALs. And that could all just be a coincidence, a gentle monk dispensing hope. Or it could be, as some people believe, that Kruba Boonchum, in another life long ago, had been a stable boy who was killed because he loved a princess, and that princess, in her grief, had stabbed herself and bled to death in what is now a cave called Tham Luang. It is possible, because anything is possible when miracles are involved, that the spirit of the cave, the princess whose blood runs through it, was waiting for him to return.

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**There were,** in the beginning, three main thoughts about how to extricate the Wild Boars. One was deceptively simple: Wait until the monsoons passed and the waters drained to the point where they could walk out, which probably would have been November or maybe even December. But the logistics—the deceptive part—made that option almost certainly fatal. Even if no trained personnel stayed with them, the boys and Coach Ek would need to be fed: Thirteen boys eating three times a day for, generously, 40 days is more than 1,500 meals, all of which would need to be ferried in by divers flirting with death themselves each time they went under.

This was not an academic concern. On July 6, after the boys had been found and a rescue plan was being drafted, a retired Thai SEAL named Saman Gunan was positioning spare oxygen tanks inside the cave, backups for divers making their way to the boys and back, a grueling exercise that took, depending on the skill of the diver and the conditions in the cave, anywhere from five to twenty-three hours round-trip. Gunan was 37 years old, married, a triathlete in excellent physical condition, and a highly trained diver. He was also a volunteer. “Loaded all my stuff onto the plane. I'm ready to fly to Chiang Rai,” he said a few days earlier in a selfie video obtained by the Associated Press. “See you at Tham Luang in Chiang Rai. May good luck be on our side to bring the boys back home.”

Gunan, diving with a partner, had deposited the spare tanks in the cave. His own ran out before he could surface. SEALs got him out, but he never regained consciousness



and was pronounced dead at a hospital.

And even if meals had been successfully delivered, what about air? There's only so much of it in a chamber plugged with water, and it was rapidly running out: When Gunan died, the oxygen concentration was beginning to border on dangerous levels.

A second possibility was to dig them out. Drilling through a couple thousand feet of rock, which would require extensive construction of infrastructure to even begin, would take too long. So rangers and guides and volunteers crawled over the mountain, looking for natural shafts. Climbers from Koh Libong Island, where for generations men have scaled sheer cliffs hunting for edible nests made of solidified bird spit—an expensive delicacy—roped up the faces of the mountain, searching for hidden openings. They found none.

That left the third option: swimming them out. It had the advantage of being quicker, but also the disadvantage of, well, swimming them out. None of the boys nor Coach Ek knew how to dive. Even if they could learn the basics, cave diving isn't the same as a practice run in a resort swimming pool. A weakened child submerged in disorienting darkness and breathing unnaturally through a regulator is more likely than not to panic. Yet through long stretches of the cave, he wouldn't be able to simply surface and regain his composure—he would be in a flooded tunnel, entombed in rock.

Perhaps one boy might make it through. Maybe half of them, or even most. But pull that off 13 times in a row, even with experts guiding them? No one wanted to say it publicly, but that plan could kill a few kids.

But the rain was still coming, and time wasn't slowing.

The Wild Boars had to come out the way they came in.

If panic was the main concern—and it was—that had to be neutralized. First, the rescuers brought full-face respirators to the cave. Rather than sticking a regulator in each boy's mouth, they would give them masks that covered everything from their chins to their foreheads. Those would allow them to breathe normally while divers—assisted by about a dozen others posted along the route—guided them toward the mouth of Tham Luang.

Second, they would be unconscious. Sedated, if you prefer the technical term, but so heavily that the difference is immaterial. An Australian cave diver and anesthesiologist named Richard Harris, who arrived at the cave on July 6, had consulted colleagues and specialists on how to dose the boys. “I've never done it in the back of a cave on malnourished, skinny, dehydrated Thai kids before,” he would say at a press conference later. “So that, for me, was the most frightening part of the week.” (Frightening enough, in fact, that the Thai government granted him diplomatic immunity before the kids were sedated.)

On July 7, authorities pushed the press farther back from the cave. Harris hiked and swam to the Wild Boars and evaluated each of them. The rescue—or the rescue *attempt*—was imminent. The next morning, a team of divers, including Harris, Stanton, and Volanthen, made their way to the muddy bank where the Wild Boars were stranded. There were many theories about which boy would go first—the youngest, the weakest, the strongest—but in the end it came down to a boy who volunteered. He was strapped into an improvised harness, with which he could be



tethered to a diver, then bundled into a buoyancy jacket to keep him neutral in the water. Too heavy, and he'd have to be held above the rocks on the bottom; too light, and he would bump against the rocks above, dislodge his mask, and drown.

And then he was sedated. It was a fast-acting medicine that put him in a near slumber, but it was also a *short*-acting drug. It would wear off after 45 minutes, give or take, so the divers were given a crash course in re-administering it mid-journey.

They slipped beneath the water, the boy essentially a package, still and quiet. There was a handle on his jacket that the diver could hold on to while keeping him clear of sharp rocks, steering him through the tightest tunnels. In dry spots, or at least spots not completely flooded, the other rescuers passed him from one to the next, like a bucket brigade, and in one long, muddy, rocky stretch, they strapped the boy onto a stretcher, clipped it to a line anchored in place by volunteer rock climbers, and maneuvered him above the muck.

In the late afternoon, more than four hours after he'd left the ledge, the first Wild Boar was delivered to the mouth of the cave, alive and relatively healthy. He was packed into an ambulance, driven to a helicopter, and then flown to a hospital in Chiang Rai to be weaned back to a proper diet and monitored for respiratory infection, which would not be unheard of after 16 days in a damp cave.

The next boy came about 45 minutes after the first, then the third and fourth in similar intervals. And that was all that could be done that day: Air tanks had to be restocked, divers had to rest. But rescue efforts continued deep in the cave, workers shoveling mud from the passageways that weren't flooded, clearing and smoothing the path.

On July 9, four more boys were pulled and pushed and floated and carried from the cave. The rescuers were practiced now, the cave well prepared: It took less and less time to get a Wild Boar through four kilometers of floodwater and rock and muck, a little quicker each trip.

The next day, the final day, the remaining five came out. Coach Ek was the last to leave the mud slope.

And then the water started rising again, quickly. One of the big pumps that had been draining the cave failed, almost as if on cue: The boys had been freed, and it was time to leave this place in peace.

Thai Navy SEALs worked toward the safe recovery of the Wild Boars.

Royal Thai Navy Facebook page via AP Photo

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**Eight days after** the miracle, the Wild Boars were released from the hospital. They'd been admitted in remarkably good shape, all things considered, but kept in isolation as a precaution. The boys had become national symbols and as such were treated with a kind of collective protectionism, as if the country itself had adopted them as its wards. Indeed, they left the hospital under the strict protection of the Thai government, which asked the swarming horde of journalists not to pester them or their families.

Instead, the Thai authorities staged a press conference after the boys and their coach

were released from the hospital. It was held in a municipal building in Chiang Rai, where a meeting room had been outfitted with rows of folding chairs and a riser for the Wild Boars and, between those two, a miniature soccer pitch.

The boys arrived, ran a short gauntlet of photographers, then dribbled a bit on the little pitch before they lined up on the riser. One of Thailand's best-known television journalists interviewed them all, restricting himself to questions that had been pre-screened by psychologists who feared traumatizing the Wild Boars. He gently extracted their story, from how they were initially trapped and how they passed the time to what they want to do now that they can go home. Eating real food, primarily, Kentucky Fried Chicken, surprisingly.

They said the things everyone knew they would say. At first, they were afraid their parents would be angry with them for being so late. Then they were just afraid. They were thirsty and hungry, so very, very hungry, when they were in the cave, and they were grateful now that they were out, grateful to the rescuers, grateful to the world. They mourned Saman Gunan, whose portrait they all had signed and in whose honor almost all of them would be ordained, briefly, as Buddhist monks. They wanted to grow up to be professional soccer players. Or Thai SEALs, like the ones who'd been with them in the darkness, the ones who were now and would forever be family.

Mostly, they wanted to go home.

Six days after the miracle, Saman Gunan was at the cave—his memory, at least, but quite possibly his spirit, too. He was represented by a large portrait set near the table with the pigs' heads and fruit, flanked by urns of pink and white flowers and sheltered by a large parasol. He was wearing a red beret in the portrait, and he had a slightly cockeyed grin, the right side of his mouth pulled back, smile lines furrowed in his cheek. He looked, in that rendering, less like a SEAL than an extraordinarily gentle man.

He was grieved, of course, but the people had come to honor him, too, in the way of martyrs and heroes. In him, in his face and the emotion it conveyed, was a reflection of all the others, the divers and spelunkers, the people who pumped water and diverted streams, the villagers who cooked food and washed clothes, the multitudes who, collectively, saved 13 people for no other reason than they needed saving.

It is no comfort to Gunan's family, but that the cave took only one of those multitudes who trespassed upon her was in its own way a miracle.

That those multitudes even came was a miracle.

And that 12 boys can hope still to grow up to be soccer players and SEALs is a miracle. That it was delivered by people of uncommon skill and exceptional courage and raw physical strength makes it no less of a miracle.

And so the people came to make merit, to give thanks and to atone, and they stayed there all day, in the shadow of the Doi Nang Nong and the damp of a coming rain, together in gratitude for a miracle and in faith that such things are still possible.

**Sean Flynn** is a *GQ* correspondent.

*This story originally appeared in the December 2018/January 2019 issue with the title "Miracle at Tham Luang."*

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## Battle against Tesla CEO is latest high-profile case for local libel lawyer

Posted by John Ruch | Sep 28, 2018

A dramatic rescue of a dozen boys from a flooded cave in Thailand this summer was followed by a bizarre sideshow: a world-famous billionaire inventor [groundlessly smearing one of the rescue advisers as a pedophile](#). On Aug. 28, Tesla CEO Elon Musk doubled down, taking to Twitter to ask why cave expert Vernon Unsworth hadn't sued him over the slur.



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"@elonmusk should check his mail before tweeting," came a prompt reply illustrated with a photo of an intent-to-sue letter.

That mic-drop tweet came from the fingertips of L. Lin Wood, a Buckhead attorney who has become one of the nation's top libel warriors after using similar in-your-face tactics to defend the honor of such clients as Richard Jewell, who was [falsely accused of the 1996 Atlanta Olympics bombing](#), and the family members of JonBenét Ramsey, the child victim of a [notorious unsolved murder](#).



Attorney L. Lin Wood. (Special)

"[The false accusations] change their life forever, because the shout of 'guilty' is never overcome by the whisper of innocence," Wood said of his clients in a recent interview.

Over the years, Wood has represented both sides in prominent sexual misconduct and assault claims. Current clients include casino mogul Steve Wynn, who denies several workplace misconduct claims, and 15 years ago Wood represented the woman who accused basketball star Kobe Bryant of rape in a case that was later settled without admission of wrongdoing. Such cases leave him with some strong concerns about the "#MeToo movement" and the social media era.

While saying he is often the first to go to the "court of public opinion," Wood is also concerned it "has no rules of evidence."

"I don't know what the future of reputation is going to be. We have normalized, in so many ways, heinous accusations," Wood said, predicting the court system eventually will tighten protections against defamation.

### **Early career and Richard Jewell**

Growing up in Macon, Wood saw his family interact with the court system in one of the worst possible ways: his father killed his mother. "I grew up in a family household of domestic violence," he said.

While that was a factor in his decision to become a lawyer, he says his personal inclination to persuasion and advocacy was the prime motive. He recalls doing well as youth pastor for a day at his church at age 13.

"Everybody was telling me I was called by God to be a preacher, and I said, 'No, I'm going to be a lawyer,'" Wood says.

His career began with medical malpractice defense in Macon. Then he moved to Atlanta to advocate for patients in such cases. After working at various firms and other specialties, including Medicare fraud cases, he now runs his own [boutique civil litigation practice](#) in Midtown. Formerly a longtime Sandy Springs resident, he now lives in Buckhead's Peachtree Park, close to his office, in a relatively modest home. He says what he likes best about his work is his personal connection with his clients, not material goods he can gather with the fees.



"I don't need a \$5 million house. All I'd have is a lot of empty rooms," he says, adding that he's happy with his Buckhead neighborhood. "I love this part of the city. I love being surrounded by trees and the community."

Wood's success in libel litigation — still a major focus of his firm — started with the extraordinary case of the Centennial Olympic Park bombing, which killed one person and injured more than 100. Jewell, a security guard at the park, was at first hailed as a hero for discovering the bomb and guiding people away from its blast zone. But an FBI investigation leak led to a media frenzy suggesting Jewell was himself the bomber.

Wood got the case as a referral from another lawyer who knew him as an aggressive courtroom advocate. Among the challenges: "I didn't know anything about libel law at the time," says Wood. He plunged in, learning as he went, in a case that "seems almost surreal" in retrospect.

Jewell had "the two most powerful entities in the world trying to put him in prison with the death penalty" — the U.S. government and the media, Wood said. "Those are spooky days."



Wood, left, and Richard Jewell at a 2006 event where Jewell was honored by Gov. Sonny Perdue

as a rescue hero of the Atlanta Olympics bombing.  
(Special)

Wood said it is important to him that he believes his clients are innocent of the accusations against them, a decision he makes after reviewing the case and his “instincts” when talking to them. So his first meeting with Jewell — in a conference room that happened to overlook Centennial Olympic Park — was crucial, especially because Wood had counted himself among those suspecting him.

“Finally I said, ‘Richard, I’ll represent you if you want me to, but first you’ll have to accept my apology. ... I thought you did it. I believed what I saw on TV. I believed what I read in the papers.’ ”

Wood’s fierce defense helped Jewell avoid prosecution and won some settlements, including from NBC News, and some cases continued even after Jewell’s untimely death in 2007 at age 44. The real criminal was later revealed to be Eric Rudolph, a hate-driven terrorist who had also bombed an Atlanta lesbian nightclub and clinics that performed abortions in Sandy Springs and Alabama.

But even Jewell’s vindication will not fully remove the cloud, Wood says, noting “his name does not appear in the [Olympic] park” and he never got a commendation from the International Olympic Committee or other Games organizers.

“People are going to remember Richard Jewell as the guy falsely accused of bombing the Olympics,” says Wood. “Richard should be remembered as a hero of the Centennial Olympic Games. Richard saved hundreds of innocent lives. ... He was a legitimate hero.”

“I love Richard Jewell,” Wood adds. “I miss him every day.”

## **The Ramseys and presidential candidates**

Wood soon was among the attorneys involved in another major media frenzy, the JonBenét Ramsey murder in Boulder, Colo., in 1996, where parents John and Patsy and brother Burke frequently became involved in lawsuits to clear their names. Over 20 years later, Wood is still representing John and Burke Ramsey in a pending case.

The Ramseys had previously lived in the Atlanta area; JonBenét was born here and is buried in Marietta. Wood said he got involved in the case when Patsy Ramsey heard about him after contacting a local family whose child had been murdered.

"People don't know this. Patsy would hear about people who lost a child and reach out to them quietly," Wood said.

As with Jewell, Wood developed a personal connection with the family, including Patsy, who died in 2006. "I was a pallbearer at Patsy's funeral," he said.

As Wood's libel-law experience grew, he found himself involved in presidential campaigns. "I always said I want to represent somebody who could be president," Wood says, "but realized if I'm representing them, they have a problem that might prevent that."

That was the case with Herman Cain, whose 2012 Republican nomination attempt failed amid sexual misconduct allegations that he denied and fought with Wood's representation. Wood said he also successfully represented another Republican contender, Rick Perry, by killing a pending Huffington Post story that would have reported some sort of allegations.

Other clients have included former California Congressman Gary Condit, who was caught up in a media frenzy over the still mysterious 2001 murder of Chandra Levy; Perri "Pebbles" Reid, manager of the R&B group TLC; casino and newspaper owner Sheldon Adelson; and "Dr. Phil" McGraw.

### **The '#MeToo' era**

The "#MeToo" movement of revealing long-suppressed stories of sexual abuse and harassment raises some concerns from Wood's libel-lawyer perspective.

"I have a healthy respect for the '#MeToo' movement," Wood says. He said that based on what he's read, he would decline to represent Harvey Weinstein, the movie producer who is now charged with rape after [scores of sexual abuse allegations against him sparked the movement](#). Wood also says he believes the accuser he represented in the Kobe Bryant case was the victim of a crime in an "egregious case."

But Wood also spends some time on Twitter defending Supreme Court nominee Brett Kavanaugh, who is the subject of sexual assault allegations that were still under investigation at press time. Wood likened the case to his defense of Cain on TV talk shows: "I made the point it's a slippery slope and I don't think we want to decide who's going to govern us based on guilt by accusation."

More generally in the social media age, Wood said, "The pendulum has swung too far in favor of the First Amendment" and he believes libel laws will be tightened – though not in the way President Trump sometimes calls for. "The change in the libel laws and First Amendment laws ... it's not going to come from legislation. It's going to come from the court system" and how it

interprets the definition of a “public figure” who has less defamation protections, Wood said.

The current laws could make Unsworth’s case against Musk tougher, Wood said, because he gave media interviews criticizing Musk’s proposal for using a miniature submarine for the cave rescue, and thus might be considered a public figure “as if he’s a president or movie star ... and I think that’s just wrong.”



## The Musk case

In taking on Musk, Wood says he is once again representing a rescue hero — in this case, Unsworth’s knowledge of the Thailand cave system was crucial information for the divers who got the survivors out.

“Vern is as close to Richard Jewell as I’ve seen in my practice,” Wood says. “But for Vernon, I’m not sure that rescue could have happened.”

As for Musk's comments, Wood says he has seen many defamation cases and, after working with ultra-wealthy clients, is familiar with the "billionaire mentality." But he says he was still surprised by the novelty of a tycoon issuing a slur while making it clear he had no evidence, then essentially inviting the target to sue.

"I've been through enough that it doesn't shock me. But what Musk did is close to shocking me," Wood said. "You can't make this up. There's no good explanation for what Mr. Musk did."

Naturally, Wood expects to win the now-filed lawsuit and secure damages in the "tens of millions of dollars."

"If you got \$20 billion," Wood asks, "how much do you have to pull out of your pocket to learn your lesson?"

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5

# EXHIBIT 9

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16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA

18 VERNON UNSWORTH,  
19  
20 Plaintiff,  
21  
22 v.  
23 ELON MUSK,  
24  
25 Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**PLAINTIFF VERNON UNSWORTH'S  
RESPONSES AND OBJECTIONS TO  
ELON MUSK'S FIRST SET OF  
INTERROGATORIES**

1 PROPOUNDING PARTY: Defendant Elon Musk

2 RESPONDING PARTY: Plaintiff Vernon Unsworth

3 SET NUMBER: One (1)

4 Plaintiff Vernon Unsworth ("Plaintiff") objects and responds to Defendant Elon Musk's  
5 ("Defendant") First Set of Interrogatories ("Requests") as follows:

6 **Preliminary Statement, Reservation of Rights, and General Objections**

7 The following objections and responses by Plaintiff are based on Plaintiff's current state of  
8 knowledge, understanding, and belief, and information currently within Plaintiff's possession,  
9 custody, or control with respect to the matters addressed in each interrogatory. Where called for,  
10 the information on which these responses are based is not necessarily derived from the personal  
11 knowledge of Plaintiff and may be derived from attorneys representing Plaintiff, information  
12 produced by Defendant, or other sources. Discovery is only just beginning, and Plaintiff reserves  
13 the right at any time to amend, modify, or supplement his objections and responses if subsequent  
14 discovery, inquiry, or investigation uncovers additional information called for by these  
15 Interrogatories. Moreover, contention interrogatories directed at the plaintiff at this stage of the  
16 litigation are generally disfavored, and more complete responses are generally given after the  
17 opportunity to conduct document and deposition discovery.

18 Plaintiff's decision to provide information in response to these Interrogatories is not to be  
19 construed as, and indeed does not constitute:

- 20 1. an admission that the information is relevant;
- 21 2. a waiver of any of Plaintiff's objections asserted in a response to a specific  
22 interrogatory;
- 23 3. an agreement that a request for similar information in this or any other proceeding  
24 will be treated in a similar manner;
- 25 4. an incidental or implied admission that Plaintiff accepts or admits the existence of  
26 any fact set forth or assumed by an interrogatory; or
- 27 5. an admission that Plaintiff's objections and responses constitute admissible  
28 evidence.

1 The following objections and responses by Plaintiff are made without waiving or intending  
2 to waive but, on the contrary, intending to preserve and preserving:

3 1. Plaintiff's right to raise all questions of relevancy, materiality, privilege, and  
4 admissibility concerning the information provided for any purpose that may arise in this action or  
5 in any other action;

6 2. Plaintiff's right to object to the use of the information provided, and/or the responses  
7 or the subject matter hereof, on any ground in this or any other action; and

8 3. Plaintiff's right to object on any grounds at any time to other discovery requests or  
9 to any other discovery involving the information provided, the documents produced, and/or the  
10 subject matter thereof.

11 The following general objections apply to these Interrogatories in their entirety:

12 1. Plaintiff objects to each interrogatory to the extent that it seeks information,  
13 documents, or materials not within Plaintiff's custody or control.

14 2. Plaintiff objects to each interrogatory to the extent that it seeks information protected  
15 by the attorney-client privilege, the common interest privilege, the accountant-client privilege, the  
16 spousal privilege, the work product doctrine, or any other applicable privileges. Any disclosure of  
17 privileged or protected information is inadvertent, and Plaintiff reserves all rights to cure any such  
18 disclosure.

19 3. Plaintiff objects to each interrogatory to the extent that it is overly broad, unduly  
20 burdensome, harassing, or unreasonably cumulative or duplicative, and to the extent that it asks for  
21 information that is already in the possession of Defendant or that is otherwise obtainable from some  
22 other source that is more convenient, less burdensome, or less expensive.

23 4. Plaintiff objects to each interrogatory and to each instruction to the extent that it  
24 purports to impose obligations or requirements beyond those specified in the Federal Rules of Civil  
25 Procedure.

26 Each of these general objections is hereby incorporated into the specific objections and  
27 responses set forth below. Subject to and without waiving the foregoing general objections,  
28 Plaintiff further objects and responds to these Interrogatories as follows:

**RESPONSES TO INTERROGATORIES****INTERROGATORY NO. 1:**

Describe all harm You have suffered, if any, as a result of the “False and Defamatory Accusations” You identify in Your Complaint, including but not limited to any harm to Your property, business, trade, profession, or occupation, any expenses You have had to pay as a result of the statements, any harm to Your reputation, or any shame, emotional distress, mortification, or hurt feelings You have experienced.

**RESPONSE TO INTERROGATORY NO. 1:**

Plaintiff objects to this interrogatory to the extent that it prematurely seeks the disclosure of expert testimony.

Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

Damages to Plaintiff’s reputation are presumed by law and Plaintiff’s Complaint in this matter speaks for itself. Moreover, Plaintiff has suffered actual reputational, emotional, and mental harm, and has suffered from stress, emotional distress, anxiety, and feelings of social isolation. Plaintiff is not seeking damages for lost wages or earning opportunities or any other special financial damages.

Defendant’s accusations have hit Plaintiff very hard emotionally. Plaintiff is concerned in regular everyday interactions and in general that the stigma of being called a “pedo” and “child rapist,” among other things, by one of the world’s most famous billionaires will follow him for the rest of his life. Even when there is a positive news story, such as a story regarding the award of the MBE to Plaintiff, it seems to Plaintiff that Defendant’s false accusations are effectively the headline and an integral part of the story. His interactions with people have been negatively impacted by Defendant’s false accusations. Plaintiff is forced to consciously consider whether any individual believes he is a pedophile, a child rapist, and/or that he married a 12-year-old child bride, which causes Plaintiff anxiety, stress, emotional distress, and feelings of social isolation. Plaintiff presumes that had Defendant been called a pedophile and child rapist on multiple occasions publicly to millions of people by a billionaire that Defendant too would be mortified, shamed, angry, stressed, and anxious, because accusations of pedophilia are so heinous. Plaintiff is



1 particularly distressed because this is not any run of the mill accusation of criminal conduct, but  
2 instead refers to one of the most detested forms of misconduct in the world.

3 Plaintiff was not known to the general public prior to the cave rescue and was, instead, a  
4 private person. To the extent he was known to the general public prior to Defendant's false  
5 accusations, it would have been in his capacity of trying to help save those trapped in the cave.  
6 After Defendant's false accusations, however, Plaintiff feels his reputation is as a pedophile or child  
7 rapist or, at the least, the guy Defendant called a pedophile and child rapist. Even the cloud of  
8 suspicion is very emotionally distressing. Plaintiff feels that Defendant created for him an  
9 incredibly wide reaching public persona as a pedophile and child rapist.

10 As a practical demonstration of the harm to Plaintiff's reputation and the emotional distress  
11 and anxiety that he has suffered, Plaintiff was investigated by the Thai authorities, including the  
12 Maesai District Police, Maesai Immigration Police, and Huai Khrai Police, as a result of  
13 Defendant's false accusations, and they interviewed the family of Plaintiff's significant others and  
14 other important people in the local village where Plaintiff stays in Thailand. This investigation  
15 communicated to members of Plaintiff's community that Defendant's accusations were legitimate  
16 enough to trigger an official response.

17 Plaintiff has also suffered stress, emotional distress, and anxiety because of the pain  
18 Defendant's accusations have caused to Plaintiff's family, including Tik (Plaintiff's partner of 8  
19 years), his wife Vanessa (although separated), his daughter Danielle, his mom Vera, his sister  
20 Shirley, and niece Sian, all of whom have experienced emotional distress and anxiety due to  
21 Defendant accusing Plaintiff of engaging in abhorrent, criminal sexual behavior with children.

22 **INTERROGATORY NO. 2:**

23 Describe any psychiatric injury or disorder You have suffered as a result of the "False and  
24 Defamatory Accusations" You identify in Your Complaint, including but not limited to (a) the  
25 characteristics and symptoms of the injury/disorder, (b) when such injury/disorder began and  
26 ended, (c) the name of any doctors or other medical professionals that have examined You for the  
27 injury/disorder, (d) the dates of such examination, (e) diagnoses, and (f) prescriptions or other  
28 treatment you have received as a result.

1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Plaintiff objects to this interrogatory to the extent that it prematurely seeks the disclosure of  
3 expert testimony.

4 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

5 Beyond what Plaintiff has described in response to interrogatory number 1, which emotional  
6 distress, anxiety, stress, and social isolation began upon learning of Defendant's accusations and  
7 continues to this day, Plaintiff has no responsive information. Plaintiff has not sought medical  
8 treatment and has not received any diagnosis regarding a psychiatric injury or disorder.

9 **INTERROGATORY NO. 3:**

10 Describe all communications between You (including Your attorney or anyone else acting  
11 on Your behalf), on the one hand, and any member of the media, news, or tabloid organization or  
12 agency, or any journalist, columnist, broadcast, commentator, editor, author, or writer, on the other  
13 hand, concerning any of the Relevant Topics.

14 **RESPONSE TO INTERROGATORY NO. 3:**

15 Plaintiff objects to this interrogatory on the basis that it is overly broad and not calculated  
16 to lead to the discovery of admissible evidence. Plaintiff further objects to the extent this  
17 interrogatory seeks information protected by the work product doctrine.

18 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

19 The CNN interview in July 2018—which was the subject of Defendant's unwarranted anger  
20 toward Plaintiff—is the only media interview given by Plaintiff wherein he discussed Defendant  
21 or the tube he or his companies created. Plaintiff has been approached by numerous media  
22 organizations over the past year by e-mail, which have been forwarded to one or more of Plaintiff's  
23 lawyers for response or no response. After the CNN interview, Plaintiff has always rebuffed any  
24 questions regarding Defendant or his tube.

25 Plaintiff took part in a BBC interview in December 2018, which is available on Youtube,  
26 with BBC South Asian correspondent Jonathan Head in which he discussed the cave rescue.

27 Plaintiff took part in a BBC Beyond Today podcast in June 2019 in London in which he  
28 discussed the cave rescue.

1 Prior to the cave rescue, Plaintiff had no previous experience with the media. When  
 2 Plaintiff was interviewed by CNN, he was expecting to be asked about the rescue and was not at  
 3 all expecting to be asked questions about Defendant or his tube. Plaintiff's response was  
 4 spontaneous, but well-justified. He honestly spoke his mind and he had no intention of denigrating  
 5 Defendant, simply a desire to give a frank answer to the question posed.

6 Plaintiff has made small contributions to three books regarding the cave rescue, one of  
 7 which has still not been released (author, Christina Soontornvat), and the others being "The Boys  
 8 in the Cave" (Matt Gutman), and "The Cave" (Liam Cochrane).

9 Plaintiff's counsel was contacted via e-mail by GQ Magazine writer Sean Flynn in  
 10 September 2018 regarding including Plaintiff in its magazine regarding the cave rescue, which will  
 11 be produced.

12 Plaintiff's counsel was contacted by Mail Online in September 2018 regarding Defendant's  
 13 accusations, correspondence regarding which will be produced.

14 Plaintiff's counsel was contacted by Sky News reporter Ceren Senkful regarding  
 15 Defendant's accusations, correspondence regarding which will be produced.

16 Plaintiff was contacted by ABC's Matt Gutman regarding Defendant's accusations,  
 17 correspondence regarding which will be produced.

18 Plaintiff and his counsel were contacted by Phillip Sherwell, correspondence regarding  
 19 which will be produced.

20 Plaintiff's counsel met with Ryan Mac on or about May 26, 2019, at Mac's invitation.

21 **INTERROGATORY NO. 4:**

22 Identify all awards, accolades, titles, and other public recognition You have received for  
 23 any reason from the year 2000 to the present.

24 **RESPONSE TO INTERROGATORY NO. 4:**

25 Plaintiff objects to this interrogatory on the basis that it is overly broad, vague, ambiguous,  
 26 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.  
 27 The terms "accolades," "titles," and "public recognition" have no precise meaning, and Plaintiff  
 28 will not and cannot identify each and every time a news article or other public reference was

1 published about him.

2 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

3 Plaintiff did not receive any awards nor is he aware of any other public recognition or  
4 notoriety prior to the cave rescue. After the cave rescue, Plaintiff was awarded the Social Impact  
5 Award in October 2018 by the British Chamber of Commerce Thailand (on behalf of the United  
6 Kingdom team involved in the rescue), an MBE in the New Year's Honours, bestowed by Prince  
7 William, a Certificate of Commendation by the Royal Humane Society (not yet formally received),  
8 and Royal Thai Insignia – King Commander (second class) Most Admirable Order of  
9 Direkgunabhorn in March 2019 (not yet received the insignia).

10 **INTERROGATORY NO. 5:**

11 Describe any actual or proposed speaking engagements that have been proposed to you or  
12 to which you have been invited from the year 2000 to the present, including but not limited to facts  
13 concerning any compensation You have been offered or received as a result.

14 **RESPONSE TO INTERROGATORY NO. 5:**

15 Plaintiff objects to this interrogatory on the basis that it is overly broad and not reasonably  
16 calculated to lead to the discovery of admissible evidence. The interrogatory, as written, is over  
17 broad as to time and subject matter, having no limitation as to the latter.

18 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

19 Plaintiff has not had any actual or proposed speaking engagements involving financial  
20 compensation. Plaintiff has done a number of presentations in Thailand since the beginning of  
21 2019, including at the NIST International School Bangkok (at its EMPOWER Event), Shresbury  
22 International School Bangkok (OFFSEAS Convention), and British Club Bangkok. For each of  
23 these, the event organizers paid for my flights from Chiangrai to Bangkok and two nights'  
24 accommodation.

25 Plaintiff has also done five or six presentations on behalf of National Park Officials of the  
26 Tham Luang National Forest after the cave rescue, specifically for visitors such as ASEAN Foreign  
27 Ministers, ASEAN Ministers of Finance, ASEAN Civil Servants, and SCB Bank Officials. These  
28 presentations were given jointly with Josh Morris of Chiangmai Rock Climbing Adventures, Khun

1 Kamolchai (Deputy General Director of Tham Luang National Forest) and Khun Chaiyon (local  
2 area Councilor).

3 Plaintiff did not receive any compensation for the interviews referenced in interrogatory  
4 three, either.

5 **INTERROGATORY NO. 6:**

6 Describe any offers to publish Your version of events in relation to the Cave Rescue,  
7 including but not limited to facts concerning amounts offered for publication, and communications  
8 with publishers.

9 **RESPONSE TO INTERROGATORY NO. 6:**

10 Plaintiff has not received any specific offer to “publish his side of events.” Aside from the  
11 information listed in interrogatory number three, Plaintiff has not received any requests for  
12 comment on the Cave Rescue within his recollection. Plaintiff has never been offered  
13 compensation for such requests.

14 **INTERROGATORY NO. 7:**

15 Describe any other actual or potential income you have earned in any way connected to the  
16 Cave Rescue.

17 **RESPONSE TO INTERROGATORY NO. 7:**

18 Plaintiff objects to this interrogatory on the basis that it is overly broad, vague, ambiguous,  
19 and not calculated to lead to the discovery of admissible evidence.

20 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

21 Plaintiff is involved in two National Geographic Documentaries not yet released. SAR  
22 Films has paid Plaintiff One Thousand (1,000) Pounds Sterling in connection with a documentary  
23 entitled “The Cave” by Kevin MacDonald, and Mallinson Television Productions has paid Plaintiff  
24 One Thousand Four Hundred (1,400) Pounds Sterling in connection with a documentary called  
25 “Drain The Oceans.” Plaintiff does not expect any further income with respect to these projects.

26 **INTERROGATORY NO. 8:**

27 Describe Your work history between 1990 and the present, including but not limited to the  
28 names and address of each workplace, title or position You held, duration of work, and the reason

1 You left such work.

2 **RESPONSE TO INTERROGATORY NO. 8:**

3 Plaintiff objects to this interrogatory on the basis that it is overly broad and not calculated  
4 to lead to the discovery of admissible evidence.

5 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

- 6 - Burgess, Wreford & Unsworth, 1987-1996, Partner, Financial Products firm (insurance  
7 and mortgage), Partnership dissolved
- 8 - Hertfordshire Independent Financial Services Ltd., 1996-2003, Managing Director,  
9 Sales & Marketing Manager, Pursued new opportunity
- 10 - BDS Mortgage Group, 2003-2004, Group Development Manager, Let go before  
11 company was sold
- 12 - Seddon Smith, 01/2005-10/2005, Adviser, Pursued new opportunity
- 13 - McGowan Carr, 10/2005-2006, Insurance & Mortgage Adviser, Pursued new  
14 opportunity
- 15 - Self-employed trader, 2006-present, Insurance and Finance Consultant

16 **INTERROGATORY NO. 9:**

17 Identify any business You currently own or have any connection to.

18 **RESPONSE TO INTERROGATORY NO. 9:**

19 Plaintiff objects to this interrogatory on the basis that it is overly broad, vague, ambiguous,  
20 and not reasonably calculated to lead to the discovery of admissible evidence.

21 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

22 Plaintiff is a self-employed insurance and finance consultant. His work is regulated by  
23 Affinity Select Insurance Services Limited (trading as Affinity Insurance & Mortgage Services),  
24 who pays his commissions.

25 **INTERROGATORY NO. 10:**

26 Describe any investigation or action taken by the Financial Services Compensation Scheme,  
27 the Personal Investment Authority, or any other governmental agency or department against or  
28 related to You concerning any business or entity with which you are or have been affiliated,



1 including without limitation Burgess Wreford & Unsworth.

2 **RESPONSE TO INTERROGATORY NO. 10:**

3 Plaintiff objects to this interrogatory on the basis that it is overly broad, vague, ambiguous,  
4 and not calculated to lead to the discovery of admissible evidence.

5 Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

6 The Personal Investment Authority investigated and reprimanded Burgess Wreford and  
7 Unsworth through its Membership and Disciplinary Tribunal in March 1999. The Financial  
8 Services Compensation Scheme declared BWU Limited, a separate business, in default in  
9 November 2004 as part of a process whereby the FSCS makes a declaration to allow individuals  
10 seeking compensation to receive it from the FSCS. This related to Low Cost Endowment policies  
11 linked to mortgages, and the maturity values of the policies did not meet projections.

12 **INTERROGATORY NO. 11:**

13 Describe any criminal proceeding or investigation involving You in any jurisdiction,  
14 including facts concerning Your arrest, arraignment, indictment, plea bargain, trial, conviction,  
15 sentencing, incarceration, or parole or probation, irrespective of whether an arrest resulted in  
16 subsequent charge, conviction, or acquittal.

17 **RESPONSE TO INTERROGATORY NO. 11:**

18 Plaintiff has never been arrested or otherwise faced criminal prosecution of any kind beyond  
19 driving/traffic offenses.

20 **INTERROGATORY NO. 12:**

21 Identify any civil lawsuit, arbitration, or similar proceeding in which either You or a  
22 business with which You are or have been affiliated was a party.

23 **RESPONSE TO INTERROGATORY NO. 12:**

24 Plaintiff objects to this interrogatory on the basis that it is overly broad, vague, ambiguous,  
25 and not reasonably calculated to lead to the discovery of admissible evidence. As written, this  
26 interrogatory seeks information that has nothing to do with Plaintiff or his own conduct and could  
27 seek, for instance, information regarding a slip and fall.

28 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

1 Plaintiff was subject to a bankruptcy proceeding in October 1999 initiated by a UK company  
2 called Standard Life in regards to a commercial loan following the split of Burgess Wreford &  
3 Unsworth, and discharged in 2002. Plaintiff recalls the sum in dispute being 36,000 Pounds  
4 Sterling. Plaintiff understands that the remaining assets/renewal commissions of Burgess Wreford  
5 & Unsworth were used in the bankruptcy to pay debts of the partnership. No other proceedings to  
6 Plaintiff's knowledge.

7 **INTERROGATORY NO. 13:**

8 Describe all Travel You have taken to outside of the United Kingdom, including but not  
9 limited to the dates of travel, cities visited, the names and addresses of accommodations where You  
10 stayed, the identities of any Persons who accompanied You, and the purpose of the Travel.

11 **RESPONSE TO INTERROGATORY NO. 13:**

12 Plaintiff objects to this interrogatory on the basis that it is overly broad, unduly burdensome,  
13 not reasonably calculated to lead to the discovery of admissible evidence, and submitted for the  
14 purposes of harassment. It is not limited in any manner by time or subject matter, and it is irrelevant  
15 to this case if Plaintiff traveled, for instance, anywhere in the world for a private law-abiding  
16 purpose when he was a child. Although Plaintiff believes it is overly broad, Plaintiff will respond  
17 dating back to the year 2000.

18 Subject to, and without waiving, the foregoing objection, Plaintiff responds as follows:

19 From 2000 to the end of 2007, all travel were family holidays with Plaintiff's wife and  
20 daughter. Plaintiff does not recall specific dates, but typically travelled during Easter and half term  
21 breaks. International travel included to continental Europe, primarily Portugal (the family's  
22 favorite destination) and Spain. The family also visited Plaintiff's brother in Donegal, Ireland on  
23 two occasions. Plaintiff has also been on golfing trips with members of the Verulam Golf Club and  
24 the Rusty Nail Golf Society, including Portugal, Spain, Ireland, and France.

25 Plaintiff did not travel abroad from 2008 to 2010, due to the UK recession.

26 Plaintiff first visited Thailand in July 2011, and has visited many times since, which is  
27 recorded in his passport. Plaintiff often stays in Thailand for several months at a time, including to  
28 be with his significant other and explore caves. On two occasions, Plaintiff has flown to Vientiane,

Laos due to rules requiring after 90 days that you travel out of country to extend your in-country stay by another 60 days (April 2017 and April 2018). Plaintiff's significant other accompanied him on the first of the two occasions traveling to Laos.

**INTERROGATORY NO. 14:**

Identify all social media or blogging site, platform, or application, including but not limited to Twitter, Facebook, Instagram, Snapchat, YouTube, Pinterest, Myspace, LinkedIn, or classmates.com, on which you created, maintained, wrote, received, or read any profile, posting, message, status update, wall comment, "Like," or other document or communication; (b) the date you initially accessed, opened, or created the social media or blogging site, platform, or application; (c) all of Your associated screen names, aliases, or accounts; and (d) whether each account is still active.

**RESPONSE TO INTERROGATORY NO. 14:**

Plaintiff objects to this interrogatory on the basis that it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

Plaintiff does not personally use Twitter or Facebook. Plaintiff does have a Facebook page created and controlled by his significant other, Tik. Plaintiff does not know the password for accessing the Facebook account. If anything arrives via Facebook, Tik will show Plaintiff and Plaintiff will advise of any response or no reply at all. Plaintiff does have an Instagram account with at present 34 posts, 19 followers, and 11 followed. Plaintiff's Instagram account is under "vernonhunsworth". Plaintiff has not created or otherwise used any social media profile.

Dated: July 17, 2019

**L. LIN WOOD, P.C.**

By: /s/L. Lin Wood  
L. Lin Wood

Attorneys for Plaintiff  
VERNON UNSWORTH

**CERTIFICATE OF SERVICE**

I am employed in the Fulton County, State of Georgia. I am over the age of eighteen years and not a party to the within action; my business address is 1180 West Peachtree Street, Suite 2040, Atlanta, GA 30309.

I hereby certify that a true and correct copy of the document titled “PLAINTIFF VERNON UNSWORTH’S RESPONSES AND OBJECTIONS TO ELON MUSK’S FIRST SET OF INTERROGATORIES” has been served via electronic mail transmission on July 17, 2019, to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system and who have otherwise agreed to electronic service. The electronic mail transmission was made from twilson@linwoodlaw.com, by transmitting PDF format copies of the document to all counsel of record, at the e-mail address provided to the Court’s CM/ECF system. The transmission was reported as complete and without error.

Executed on July 17, 2019, at Atlanta, Georgia.

/s/ G. Taylor Wilson

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

v.

ELON MUSK,


Defendant.

Case No. 2:18-cv-08048-SVW (JC)

**PLAINTIFF VERNON UNSWORTH'S  
VREIFICATION OF RESPONSES  
ELON MUSK'S FIRST SET OF  
INTERROGATORIES**

I declare under penalty of perjury under the laws of the United States of America that the foregoing responses to Elon Musk's First Set of Interrogatories to Vernon Unsworth are true and correct to the best of my knowledge.

Executed on July 16, 2019.

  
\_\_\_\_\_  
Vernon Unsworth

# EXHIBIT 10



**To:** vernon\_unsworth@yahoo.co.uk[vernon\_unsworth@yahoo.co.uk]  
**From:** Philip Sherwell  
**Sent:** Sat 7/21/2018 2:27:35 PM  
**Subject:** Fwd: Vernon Unsworth

And here's a self explanatory email I received for you  
best again, philip

----- Forwarded message -----

From: **Mark Stephens, CBE** <[Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com)>  
Date: 18 July 2018 at 22:21  
Subject: Vernon Unsworth  
To: "[philipsherwell@gmail.com](mailto:philipsherwell@gmail.com)" <[philipsherwell@gmail.com](mailto:philipsherwell@gmail.com)>

Dear Philip,

As a dive instructor, I was very interested and followed closely your coverage of the Thai cave rescue and have been looking into the matter of Elon Musk's appalling and libellous tweet regarding Vernon Unsworth. As a media lawyer, I was approached by the media and have been quoted in a couple of news articles about Mr Unsworth's very good chances of success if he were to bring a defamation case against Mr Musk, if he were interested, I might well do it on a no-win, no-fee basis.

Do you have Mr Unsworth's contacts, which you could pass onto me, or would you be able to invite him to get in touch with me?

If he is already well represented that's all good: but if he wasn't, I wanted to offer pro bono advice so he could make an informed decision about his position.

Many thanks for any help

Very best,

**Mark Stephens, CBE**

Senior Member  
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Philip Sherwell  
Bangkok

Tel: +66 97 045 1975

# EXHIBIT 11

**To:** vernon\_unsworth@yahoo.co.uk[vernon\_unsworth@yahoo.co.uk]  
**From:** Philip Sherwell  
**Sent:** Sat 8/18/2018 7:34:59 AM  
**Subject:** Checking in

Hi Vernon, hope you're well and that your trip back to the UK went well. Was nice to see the pictures of you and your fellow rescuers at Downing St.

I've just been reading about Elon Musk complaining about how difficult his life is

(<https://www.thetimes.co.uk/edition/news/its-a-pain-being-me-says-elon-musk-after-tough-year-5r5dsh5k9>). What an awful man....

Which is prompting me to drop a line to ask if there are any developments on your plans to look into possible legal action for his comments?

Just asking out of interest, as we talked about this and I know Mark Stephens had been in touch, but if there was a follow-up for the Sunday Times at some stage, then that would of course be of interest for us.

with thanks and best wishes, Philip

--  
Philip Sherwell  
Asia Correspondent  
The Sunday Times  
Bangkok

Tel: +66 97 045 1975

# EXHIBIT 12



**To:** Gutman, Matt[Matt.Gutman@abc.com]  
**From:** Vernon Unsworth  
**Sent:** Wed 3/20/2019 3:20:18 AM  
**Subject:** Re: Dear Sir - hello mate, just checking in

Hi

Some information in RED


Best  
Vern

---

**From:** "Gutman, Matt" <Matt.Gutman@abc.com>  
**To:** Vernon Unsworth <vernon\_unsworth@yahoo.co.uk>  
**Sent:** Tuesday, 19 March 2019, 12:29  
**Subject:** RE: Dear Sir - hello mate, just checking in

All is well here.

I still cannot understand why that cleanup is not completely underway? What's the hold up?

And yes, as you learned first hand organization is not their best thing... though a piss up at the Bangkok Brewery would sound like fun ;) Navy Seal been in the last 2 days, last day today to remove all the dive equipment. They could only get past Sam Yek by 100 metres as they said the way on was blocked. What a load of CRAP. Not being expert cavers they don't know what to look for. Basically they are in an area which I know well and silts up. This happens every year after the flood water recede. All they need to do is spend probably less than an hour digging away the silt, EASY. There will be a draught so easy to follow. Call themselves experts  Clean up continues by the 'Por Por' for 5 days 24 to 29 March. WTF !!!

So sorry to hear about Martin. What happened to him? Pneumonia. On a life support machine for 15 days in an induces coma. Plus a tracheostomy. Lucky guy.

You are probably aware but there seem to be a number of projects kicking into higher gear about the rescue – a big documentary from nat-geo and also the Ivanhoe movie – SK global seem to have secured the boys rights but I'm not sure how far along it is. I'm involved in a couple of NG projects. I was approached by a guy from SK/Warner Bros back on 6th October 2018. He was actually in Bangkok from 6th January until the announcement was made. Looking good 555

Anderson is now in Italy – tough life. Haven't been in touch with Rick the past few months, but I assume all is well. Thanet seems to be living his best life. Was with Rick for a few days when he was over here. Thanet and I keep in touch.

What's the latest with your friend Elon? UK High Court proceedings due to be lodged as he failed to respond to the action. Better get his BIG cheque book out. Case in LA due to be heard on 1st April as his Lawyer's tried to get the case dismissed on the basis he didn't mean what he said and Twitter is covered by the First amendment but some of his comments were made by EMAIL. Basically he has little or No Chance. Wait for the judges decision on 1st April due to start at 1pm.


Big hug  
m

---

**From:** Vernon Unsworth [mailto:vernon\_unsworth@yahoo.co.uk]  
**Sent:** Saturday, March 16, 2019 7:24 PM  
**To:** Gutman, Matt <Matt.Gutman@abc.com>  
**Subject:** Re: Dear Sir - hello mate, just checking in

Hi Mate

Hope u r well.


Still here in Thailand. Tham Luang is still closed and all the gear and equipment still in there !!! Hopefully will get cleaned up by the end of March. CRAZY WTF  I and a team got to Sam Yek on the 17th January but water at



Sam Yek stopped us going any further. Having said that there was NO water all the way from the entrance until Sam Yek. Water level at Sam Yek was lower than I expected. Will now be open all the way to where the boys were found.

The Governor had to declare Tham Luang Cave as a 'state of emergency' so that funds could be allocated to fund the clean up. Once it's finished the cave will be handed back to the National Park. I have been involved in numerous meeting regarding all this. You won't believe what has been going on, fucking incredible. They couldn't organise a piss up in a Bangkok Brewery.

I go back to the UK on 6th June for 10 days with Tik. Then back until mid July then I return to the UK until mid September (3 months).

Rob Harper joins me at the end of this month and we will do some serious caving including making Tham Luang the longest cave in Thailand.  Martin Ellis was very ill back in December, lucky to still be here. Pneumonia and was in an induced coma for 15 days. Very Lucky Man.

Call me if you need a chat

Take Care  
Best  
Vern

---

**From:** "Gutman, Matt" <[Matt.Gutman@abc.com](mailto:Matt.Gutman@abc.com)>  
**To:** "[vern\\_unsworth@yahoo.co.uk](mailto:vern_unsworth@yahoo.co.uk)" <[vern\\_unsworth@yahoo.co.uk](mailto:vern_unsworth@yahoo.co.uk)>  
**Sent:** Saturday, 16 March 2019, 16:59  
**Subject:** Dear Sir - hello mate, just checking in

Thinking of you this morning.

Hope this finds you well and scraped up a few miles into some stinking, dark, rocky cave. your happy place...

All's well here. I just got back from Ethiopia covering the plane crash.

Are you back in the UK? Or still bopping around Thailand?



Matt Gutman  
ABC News Chief National Correspondent  
+1 973 738 3427  
[@mattgutmanABC](https://twitter.com/mattgutmanABC)

# EXHIBIT 13



02/03/2019, 07:07 - vernonunsworth: 2nd July  
 02/03/2019, 07:15 - vernonunsworth: IMG-20190302-WA0005.jpg (file attached)  
 02/03/2019, 09:21 - vernonunsworth: IMG-20190302-WA0006.jpg (file attached)  
 02/03/2019, 09:22 - vernonunsworth: This is Suman on 2nd July  
 02/03/2019, 22:12 - John Volanthen: Thanks vern. You'll enjoy the day!  
 06/03/2019, 08:08 - John Volanthen: Happy birthday. Have a good one!  
 06/03/2019, 08:10 - vernonunsworth: Thanks mate. I'd forgotten it was my birthday💎 it's an age thing 💎  
 07/03/2019, 07:45 - vernonunsworth: It is officially announced by The Ministry of Culture that SkG and Netflix Companies, my team was selected and awarded the story rights of the 12 boys and coach involved in the incident at Tham Luang in June of 2018. we are very excited to embark on this story telling journey to the world "from Local to Global " krub  
 07/03/2019, 07:46 - vernonunsworth: Glad I waited patiently. I was approached by Warner bros back in October  
 07/03/2019, 07:47 - vernonunsworth: IMG-20181119-WA0005.jpg (file attached)  
 07/03/2019, 08:46 - John Volanthen: Congratulations. Great work  
 07/03/2019, 08:47 - John Volanthen: Who does bugs play;-)  
 07/03/2019, 12:45 - vernonunsworth: The Doc. What's up Doc 💎💎  
 07/03/2019, 13:50 - John Volanthen: Excellent!  
 22/03/2019, 04:00 - vernonunsworth: IMG-20190322-WA0003.jpg (file attached)  
 22/03/2019, 04:00 - vernonunsworth: IMG-20190322-WA0001.jpg (file attached)  
 22/03/2019, 04:00 - vernonunsworth: IMG-20190322-WA0002.jpg (file attached)  
 22/03/2019, 04:00 - vernonunsworth: IMG-20190322-WA0000.jpg (file attached)  
 22/03/2019, 04:01 - vernonunsworth: Your named. Royal Thai Insignia Highest Order. You're accumulating quite a collection. Thoroughly deserved💎💎  
 22/03/2019, 04:08 - vernonunsworth: IMG-20190322-WA0004.jpg (file attached)  
 22/03/2019, 12:11 - vernonunsworth: Mate was there a section after Sam Yek where there is not a dive line used  
 22/03/2019, 12:25 - vernonunsworth: Way on through Sam Yek is ok but according to the Navy Seals totally blocked about 150metres further on. Never known this to happen in the 7yrs I've been exploring the system  
 22/03/2019, 12:32 - John Volanthen: Hi vern. The line was continuous from chamber 3 to the children in one form or another. Definitely no gaps. Very strange.  
 22/03/2019, 12:33 - vernonunsworth: Thanks for this. So the line should give me an indication of where to dig?  
 22/03/2019, 12:37 - vernonunsworth: Someone mentioned that there was a section of around 20 metres where dive line not used. I said very strange. If low and wide more important for a line to be used💎  
 22/03/2019, 12:39 - John Volanthen: Perhaps this was the black tape. The line switches to climbing tape briefly but was continuous  
 22/03/2019, 12:40 - vernonunsworth: Thanks mate💎  
 22/03/2019, 12:41 - vernonunsworth: Could this have broken by any chance?  
 22/03/2019, 12:41 - John Volanthen: The first thai group to the kids cut the belay on the lhs so the line ran down the passage centre  
 22/03/2019, 12:42 - vernonunsworth: Makes sense💎  
 22/03/2019, 14:24 - John Volanthen: Seems unlikely the line would have broken after we all left. I'll be interested to see what you find. Seems equally unlikely the passage completely filled with silt  
 22/03/2019, 14:28 - vernonunsworth: Keep you updated. A section in Monks Series does completely silts up. Last June me and Rob spent 3+hrs opening up this section💎  
 25/03/2019, 07:18 - vernonunsworth: [https://m.facebook.com/story.php?story\\_fbid=2006088292847893&id=1393136284143100](https://m.facebook.com/story.php?story_fbid=2006088292847893&id=1393136284143100)  
 25/03/2019, 07:18 - vernonunsworth: My god that's a load of silt and the Air Tank Cylinder in the roof (exclamation)  
 25/03/2019, 07:18 - vernonunsworth: That is an amazing amount of silt  
 25/03/2019, 07:18 - vernonunsworth: Got a big job on tomorrow boys 555  
 25/03/2019, 07:18 - vernonunsworth: Looks to be in an area around Station 7 totally blocked  
 25/03/2019, 07:18 - vernonunsworth: Bloody AMAZING great photo of the silt banks and how the waters have cut through  
 27/03/2019, 09:16 - vernonunsworth: Taking the Navy Seals back in tomorrow to recover rest of their air tank cylinders. They need there hands holding💎 I'm 100% confident it's Pattaya Beach and the steep slope opposite is what the boys or someone named Nerm Nom Sao. 💎  
 27/03/2019, 09:23 - John Volanthen: Its interesting. I went a way beyond the boys location and cant visualise the turn. Neither Rick or I spotted the turn on the way in before finding the boys but Rick thought he saw the turn on his compass on the way out. We were looking for that dog leg. Have s good trip today. And thanks for the info. Say hi to rob when he arrives  
 27/03/2019, 09:29 - vernonunsworth: Rob is with Martin at the moment. I'm going over to Pua in Nan Province on Monday morning to join him. The slope on the right is no more than 5 metres to the sharp dog leg left. Pattaya Beach has 2 areas. Giong in on the right huge steep sand bank where I can see your dive line high up. Next beach section is on the left and I guess this is where you kitted up the boys as it's less steep than the slope opposite where they came down from. 💎  
 28/03/2019, 16:06 - John Volanthen: Ok, that makes some sense. The rightbank was entirely under water. The line was anchored here then crossed the passage to the lhs then right up into the Avenue where the boys were. We kitted the boys up on the steep bank of the aven  
 28/03/2019, 16:06 - John Volanthen: Aven not Avenue  
 28/03/2019, 23:43 - vernonunsworth: Nerm Nom Sao never existed as a named section of the cave. It was someone from the media who came up with the name. Mix one of the boys was with us yesterday when we escorted the Navy Seals in to recover the rest of there equipment. He said they didn't come up with the name Nerm Nom Sao. Also they pooped on the beach. They literally swam across and swam back CRAZY. 💎  
 01/04/2019, 03:09 - vernonunsworth: Good luck in Hang Song Vietnam💎  
 01/04/2019, 03:14 - vernonunsworth: Hang Son Doong. With Rob Harper at the moment in Pua Nan Province. Tham Maa today to hopefully extend the northern section and the active inlet into the Main passage💎  
 27/04/2019, 04:50 - vernonunsworth: Hi JV hope you are well. Rob Harper has been over since end of March. Been active with caving and



jungle bashing. Sorry to ask but Singha keep asking me for a photo of you with the watch. If possible could you send over one via WhatsApp. Much appreciated Best Vern♦♦

12/06/2019, 20:45 - John Volanthen: Congratulations on the MBE. Nice photo on Facebook. How are things?

12/06/2019, 20:46 - John Volanthen: Should hopefully have a lot more flexibility soon. What are your thoughts on the sump at the end of tham luang?

12/06/2019, 20:51 - vernonunsworth: Thanks mate just wish the media would stop referring me as a 'diver' and Ex-Pat. Lost count on how many times I've said I'm not either. Back to Thailand on Friday morning then back on 19 July for at least 3 months♦♦

12/06/2019, 20:53 - vernonunsworth: Rob Harper is probably the best person to give a solid opinion. It certainly looks promising a looked to go deep and vis looked really good

12/06/2019, 20:55 - vernonunsworth: I'm at the humane society dinner in November♦

12/06/2019, 20:56 - John Volanthen: I'd be keen to go back post monsoon.

12/06/2019, 20:56 - John Volanthen: Excellent. Will be good to catch up in November

12/06/2019, 20:57 - John Volanthen: Look forward to it. You working hard or managing to slack off?

12/06/2019, 20:57 - vernonunsworth: Definitely. I think we would have no shortage of sherpas. Rob is trying to arrange things for next year both for Tham Luang and the resurgence cave of Tham Nam Pua in Nan Province.

12/06/2019, 20:59 - John Volanthen: Excellent. I'd be keen. If you get to the point of deciding dates and it's ok for me to tag along, let me know. I'll chat to rob.

12/06/2019, 21:00 - vernonunsworth: Working hard and need a break. The last year has just flown by

12/06/2019, 21:03 - vernonunsworth: April/May is best for low water levels. Mate you would be very welcome. I think many cavers/divers would be interested and we could do some serious exploration with a strong team♦♦

12/06/2019, 21:05 - vernonunsworth: Hopefully Tham Luang Cave won't silt up again just after Pattaya Beach area very odd as it's never happened before certainly in the last 7yrs

12/06/2019, 21:06 - John Volanthen: Thankyou. Will be interesting to see if it does silt up

12/06/2019, 21:09 - vernonunsworth: Me and Josh Bratchley measured all the dive lines from Chamber 3 to the end of your dive line where the boys were. Josh did 5/6 pages of notes. Please contact Josh as it will make interesting reading. Raemanants line through Sam Yek to the black tape measures 115metres. The black tape measures exactly 20metres.♦♦♦

12/06/2019, 21:10 - vernonunsworth: Part of your dive line is buried through the silted up section

12/06/2019, 21:49 - John Volanthen: Will do. Cheers John

22/06/2019, 12:22 - vernonunsworth: IMG-20190622-WA0004.jpg (file attached)

22/06/2019, 12:22 - vernonunsworth: IMG-20190622-WA0005.jpg (file attached)

22/06/2019, 21:16 - John Volanthen: Madness. Our heads but different bodies. Where is this?

23/06/2019, 04:11 - vernonunsworth: The new museum up at Tham Luang ♦♦♦

28/06/2019, 02:12 - vernonunsworth: Senator Weerasak sends his fond regards and memories 1yr on♦♦♦

28/06/2019, 08:12 - John Volanthen: Please send my regards.

Cheers John

04/07/2019, 18:01 - John Volanthen: Vern, rick an I aren't going to get together this weekend. Attached is a brief video as promised.

Speak soon . Cheers John

04/07/2019, 18:13 - John Volanthen: VID-20190705-WA0000.mp4 (file attached)

14/07/2019, 03:32 - vernonunsworth: Back online mate repair shop in Maechan managed to get a new front screen. Hope yr good Best Vern

14/07/2019, 03:41 - vernonunsworth: <https://www.thesun.co.uk/news/9469615/hero-rescue-diver-reveals-unseen-haunting-messages-left-on-cave-wall-by-the-12-trapped-thai-boys/>

18/07/2019, 18:41 - John Volanthen: Interesting. Good combination, mikko and the sun :-)

19/07/2019, 07:04 - vernonunsworth: You're dead right just landed back➔

23/07/2019, 16:44 - vernonunsworth: Hi Vernon. Thanks again so much for coming in yesterday ♦ It was a real honour to meet you. I'm just editing your interview and we would like to make it into a bigger special programme for the upcoming bank holiday. We want to give a real sense of just how many people helped with the rescue.. For this it would be great to have some extra voices. I wondered if I could trouble you to help me get in touch with Rick and John. It would be also very interesting to speak with Doc Harry. Would you be able to ask them on my behalf to see if they might be interested to be interviewed by Jo and then I can connect with them. (I'm not sure how inundated with requests they are!) thank you and best wishes!

23/07/2019, 16:45 - vernonunsworth: Hi mate this is for BBC Outlook. If you're interested let me know and I will put you in touch Best Vern ♦

27/07/2019, 09:31 - vernonunsworth: Trapped In A Cave With Water Rising - Thai Cave R...: <https://youtu.be/vMMV0Beb9uM>

27/07/2019, 14:12 - John Volanthen: That has a very western feel!

27/07/2019, 14:12 - John Volanthen: Interesting

27/07/2019, 14:14 - vernonunsworth: The cartoon that was made in India last year was so bad as to be funny

27/07/2019, 14:14 - vernonunsworth: You done any diving recently 🙏🙏

27/07/2019, 14:18 - John Volanthen: Connor, Charlie and I pushed the frais puits near dijon a couple of weeks ago. I hadn't been to the end for 10 years, but found the way on. Left after 200m in massive passage. Now I need to go back! How long are you in the uk for?

27/07/2019, 14:20 - vernonunsworth: Amazing.♦ Middle of September but then back in November.

27/07/2019, 14:21 - vernonunsworth: RHS dinner 13th November♦♦

02/08/2019, 07:29 - vernonunsworth: Tham Luang Cave. Still no flood waters through the main entrance chamber♦

03/08/2019, 06:08 - vernonunsworth: <https://www.activityfan.com/blog/evolution-caving-cave-diving-equipment/>

05/08/2019, 19:03 - vernonunsworth: <https://www.macleans.ca/thai-cave-rescue-heroes/>

05/08/2019, 19:03 - vernonunsworth: ♦♦♦

05/08/2019, 19:05 - vernonunsworth: Reymenants again

05/08/2019, 19:47 - John Volanthen: Saw this one a while back. Quite funny:-)

05/08/2019, 19:48 - vernonunsworth: First time for me it popped up on Google main page♦

# EXHIBIT 14



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## The New York Times

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# *Elon Musk Thinks a Mini-Submarine Could Help in Thai Cave Rescue*

By Julia Jacobs

July 7, 2018

Engineers from companies led by Elon Musk, the billionaire known for outside-the-box ideas like his aspiration to colonize Mars, were en route to Thailand on Saturday to offer their expertise to help rescue 12 boys and their soccer coach from the Tham Luang cave in northern Thailand.

The engineers were sent from Tesla, Mr. Musk's electric vehicle company; SpaceX, his rocket company; and the Boring Company, which specializes in tunneling and construction, a Boring Company spokesman said.

There are two or three engineers on the ground in Thailand, with more on the way, the spokesman said. He said representatives from the companies were in discussions with the Thai government about how they could help.

Divers began a rescue mission on Sunday morning that could continue for several days, said its commander, Narongsak Osottanakorn.

On Twitter, Mr. Musk has mused about potential inventions that could help the trapped soccer team, including a miniature submarine made from part of a SpaceX rocket.

Edgar Choueiri, a professor at Princeton University who specializes in rocket research, said Mr. Musk's submarine idea suggested that he imagined the Falcon rocket's hollow transfer tube — which helps move liquid oxygen to fuel the rocket's engine — would be the appropriate size to transfer the boys out of the flooded cave.

"I would never bet against Elon Musk," Mr. Choueiri said.

Others were not as confident.

Greg Moore, a regional director for the National Cave Rescue Commission, said most rescues prompt a series of newfangled ideas that are not necessarily practical. Mr. Musk's submarine would likely have trouble fitting through the narrowest passageways, he said.

Earlier, Mr. Musk had suggested a nylon tube that would inflate like a bouncy castle to form an underwater air tunnel.

The boys were trapped in the cave for 10 days before a group of cave divers discovered them alive last week. Rescuers are worried about diminishing oxygen levels in the cavern where they have taken refuge, as well as monsoon rains that could push water levels even higher.

On Friday, a former Thai Navy SEAL lost consciousness and died while placing oxygen canisters on a route within the cave being used in the rescue effort.

This is not Mr. Musk's first foray into emergency assistance. In the wake of Hurricane Maria in Puerto Rico, which resulted in devastating power outages, Tesla provided batteries to help keep the lights on.



# EXHIBIT 15

## The New York Times

# Elon Musk Defends His Rejected Mini-Sub Plan for Thai Cave

By Mukkita Suhartono and Julia Jacobs

July 10, 2018

MAE SAI, Thailand — As the world watched rescuers struggle to save 12 boys and their soccer coach trapped in a cave in northern Thailand, the tech billionaire Elon Musk dreamed up a “kid-size” submarine to help. It turns out they didn’t need it.

So he left it there, “in case it may be useful in the future,” he said on Twitter.

By Tuesday, the rescue operation had succeeded in saving all 13 people trapped in the Tham Luang Cave. Earlier this week, eight of the soccer teammates were evacuated from the flooded cave, a mission that required guiding the boys through passageways filled with water.

*[Update: The Thai Navy may have a use for the abandoned mini-submarine.]*

It was a daunting task. On Friday, a former Thai Navy SEAL lost consciousness and died while placing air canisters on a route within the cave being used in the rescue effort.

Once the last four boys, their soccer coach and military personnel were evacuated Tuesday, Thai officials said in a Facebook post that the mission was complete. It had taken 18 days, dozens of divers and hundreds of volunteers, but Mr. Musk’s mini-submarine invention was left on the sidelines, a Thai official said.

Mr. Musk himself was on the scene. He wrote in a tweet early on Tuesday local time that he had just returned from a large cavern in the Tham Luang cave complex where he had deposited the quickly assembled sub. “It is made of rocket parts,” he explained. “Leaving here in case it may be useful in the future.”

On Tuesday, the head of the search operation, Narongsak Osottanakorn, until recently the provincial governor, rejected the notion that Mr. Musk’s custom-made submersible was suitable for the extraction.

“I assure you that the equipment he brought to help us is not practical for our mission,” Mr. Narongsak said. “Even though the equipment has state of the art technology, it does not fit our mission in the cave.”

Over the weekend, Mr. Musk dispatched 10 engineers from his companies to assist in the rescue effort in Thailand. They sent engineers from Tesla, Mr. Musk’s electric vehicle company; SpaceX, his rocket company; and the Boring Company, which specializes in tunneling and construction, a Boring Company spokesman said on Saturday.

Mr. Musk had mused on Twitter that they could build a “tiny, kid-sized submarine” with a part from a Falcon rocket, which SpaceX produces. He had said that a transfer tube, which helps move liquid oxygen to fuel the rocket’s engine, could serve as the body of the submarine.

Mr. Musk’s representatives did not make him available for comment, but a SpaceX spokesman said that divers with the mission had signed off on the efforts.

“Multiple divers involved with the rescue said the mini-sub design was viable, and their feedback directly informed our engineering and testing,” he said.

The company did not immediately respond to a follow-up question about whether it planned to remove the abandoned submarine from the cave area.

In his tweets amid the rescue, Mr. Musk presented his own evidence that team leaders had welcomed his help. He said of Mr. Narongsak: “The former Thai provincial governor (described inaccurately as ‘rescue chief’) is not the subject matter expert.”

He said the expert was Richard Stanton, one of the first two British cave divers to reach the soccer team, and Mr. Musk shared an email in which Mr. Stanton had asked him to “please keep working on the capsule details.”

But a spokesman for Mr. Stanton said Tuesday that the cave proved to be too narrow for the mini-submarine.

Soon after the cave rescue was complete, it became clear that Mr. Musk would be sending many more employees to Asia in the coming year. On Tuesday, Tesla announced an agreement with Chinese authorities to build a battery and automobile factory in Shanghai, its first plant outside the United States.

Muktita Suhartono reported from Mae Sai, Thailand, and Julia Jacobs from New York.

A version of this article appears in print on July 10, 2018, Section A, Page 8 of the New York edition with the headline: Billionaire Leaves Vessel In Thailand

# EXHIBIT 16

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AD

## Technology

### Why was Elon Musk at the Thai cave rescue?

10 July 2018

[Thailand cave rescue](#)

**Tech entrepreneur Elon Musk's attempt to help the Thai cave rescue mission has attracted both praise and criticism.**

The SpaceX and Tesla chief posted on social media that he had visited the operation's command centre, where he said he had left a mini-submarine that had been designed to carry

Exhibit 16, Page 197

a trapped football team to safety.

The head of the rescue mission thanked Mr Musk for his offer.

But he said the sub could not be used.

"The equipment they brought to help us is not practical with our mission," Narongsak Osotthanakorn explained.

"Even though their equipment is technologically sophisticated, it doesn't fit with our mission to go in the cave."

Thai Navy Seals subsequently announced that all 12 boys and their coach had been brought out safely.

Mr Musk **has since tweeted an email from Richard Stanton** - one of two British caving experts called in to front the rescue - which had urged the business leader to build the capsule as quickly as possible.

- **All 13 out after 17-day ordeal**
- **How risky was the rescue?**
- **Live: All boys and coach rescued**

Content is not available

Mr Musk first **suggested he could help save the trapped children** and their football coach on 4 July, in response to a Twitter user's suggestion that he might be able to assist the effort at the Tham Luang caves in Chiang Rai.

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Replay

**Two days later Mr Musk confirmed** he was sending engineers from SpaceX and his Boring Company - which specialises in drilling - to Thailand.

He followed with several posts speculating about possible technical solutions to the problem. These included **a proposal for an air tube** that could be inflated "with air like a bouncy castle", which he suggested could let the cut-off party walk to freedom.

Mr Musk ultimately settled on turning part of one of SpaceX's Falcon rockets into a "kid-size submarine", and he posted videos of its tests online.

When questioned whether the craft risked blocking a tight section of the tunnel system, **he replied that his engineers had built an inflatable replica** of the craft, which could be used to check that this would not happen.

He added that a **smaller version was also being built**.

"Based on extensive cave video review and discussion with several divers who know [the] journey, SpaceX engineering is absolutely certain that mini-sub can do entire journey and demonstrate at any time," **he posted**.

Although the craft was not needed, Mr Musk has said that he has left the mini-sub with the Thai authorities "in case it may be useful in the future".

The billionaire has form with making eye-catching humanitarian acts.

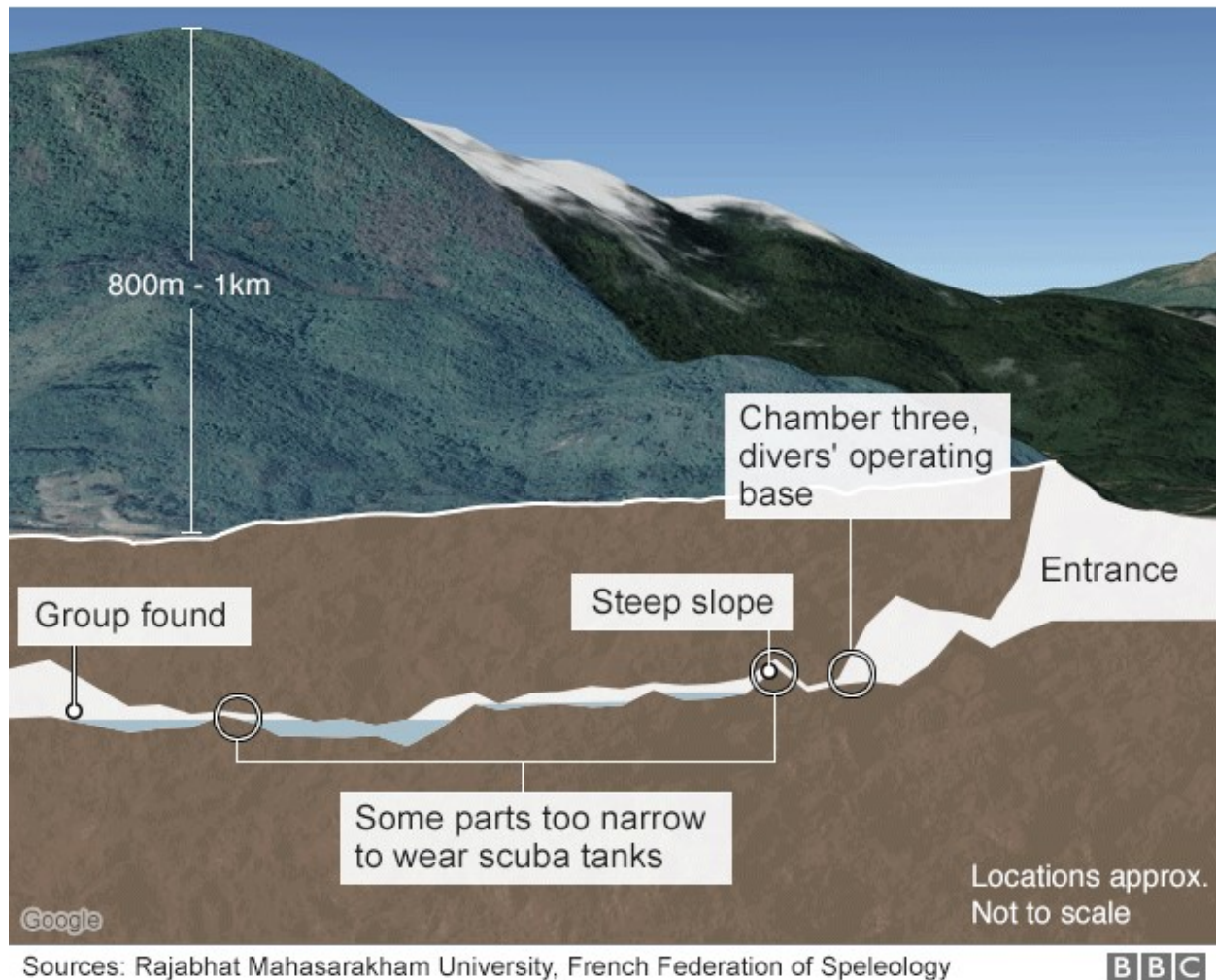
Last year, he was thanked by Puerto Rico's governor for setting up a solar panel and battery system to provide power to a children's hospital in San Juan after it was hit by a hurricane.

But while his most recent intervention has won him praise from some, others have questioned his motivations and suggested he might even have been a distraction.

"Elon Musk is well known to have an eye for the headlines, but to be fair he only became involved after a message from one of his army of fans on Twitter," commented the BBC's technology correspondent Rory Cellan-Jones.

"The fact that his company's space technology and its much vaunted tunnelling skills proved irrelevant to the operation is a reminder that sometimes this tech superhero doesn't quite match up to the Iron Man of his fans' dreams."

## Cave rescue hazards



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## Technology



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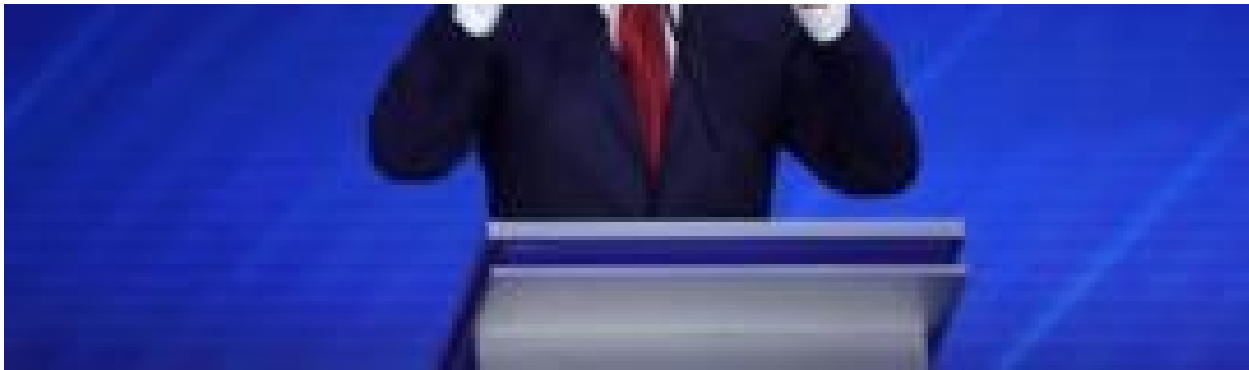


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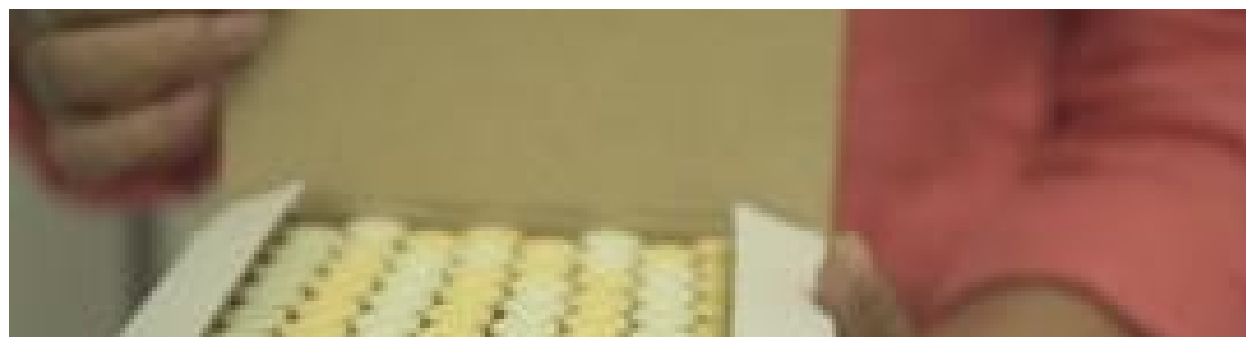
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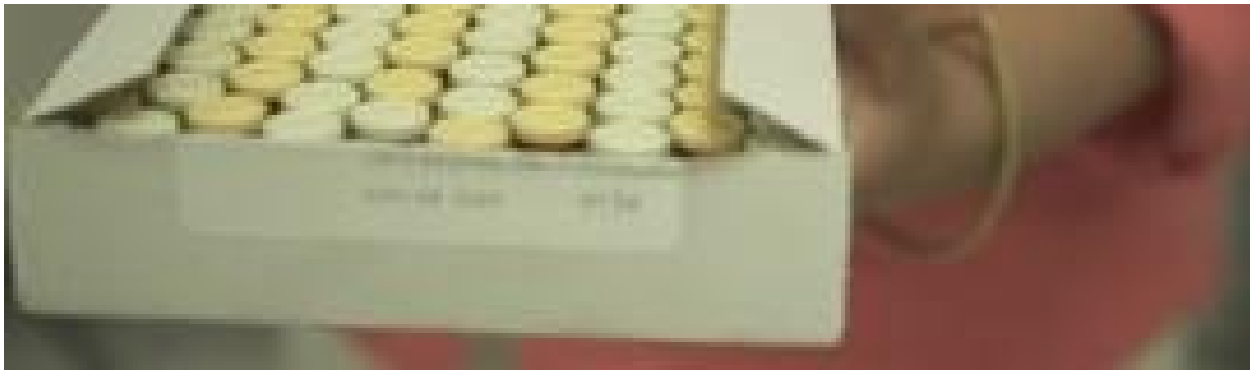


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# EXHIBIT 17

## Is Elon Musk Serious?

*Adam Clark Estes*



Photo: Getty

A kid-sized submarine arrived in northern Thailand, just a few hours before the final four members of a youth soccer team and their coach [were rescued](#) from the flooded Tham Luang cave complex. Elon Musk, whose minions had built the sub out of SpaceX rocket materials for the sole purpose of moving the trapped boys to safety, delivered the mini sub himself and announced his presence [in a tweet](#) to his 22 million followers. Meanwhile, the rescue chief said that the kid-sized submarine [was “not practical”](#) for the boys, as thousands heaped praise onto Musk for doing—well—it’s unclear if the bombastic billionaire really did anything helpful. Which makes you wonder: is Elon Musk serious with this shit?

The short answer to that question is no. Musk has a long track record of promising to solve huge problems and then either [missing deadlines](#) or [falling short](#). Along the way, he’s also built up a cult of personality that leads fans to compare him to comic book superheroes. So even if Musk isn’t really serious about his ridiculous, buzz-building projects, plenty of people still think he is. We need to stop that.

Let’s just [look at the facts](#) from the Thai rescue effort. The boys soccer team went missing on June 23 and were found alive on July 2. At that time, the Thai government undertook a massive rescue effort that involved Thai Navy SEALs, [British cave divers](#), [United States Air Force search-and-rescue specialists](#), as well as crews from [several other nations](#). Within a week, the rescue operation mapped out the cave, assembled a plan, used pumps to reduce the water level, delivered food and medicine to the stranded team, and even provided medical support to the boys. One Thai Navy SEAL diver [died in the process](#). But on Sunday, rescuers [brought four of the boys out](#) of the cave and to safety. On Monday, [four more emerged](#). The final five [were rescued on Tuesday](#), just after Elon arrived with his little submarine.

To be clear, neither the Thai government nor the rescue effort asked Musk to build them a sub, that we know of.

The billionaire CEO of Tesla and SpaceX apparently started thinking about the idea, when he replied to a [Twitter mention](#). He was almost humble at first:

Twitter user MabzMagz then compared him to Iron Man—which as we’ve said is a popular thing to do—and Musk’s gears started to turn. First, he said that his own Boring Company was “[pretty good at digging holes](#),” and then, the billionaire started a stream of consciousness sort of dialogue about how he might rescue all of the boys with some sort of “[escape pod](#).” Right after a [retweet](#) about fake news and Tesla manufacturing success, the idea for “a tiny, kid-sized submarine” [was born](#). Musk said he’d use “the liquid oxygen transfer tube of the Falcon rocket as hull,” and rather remarkably, [tweeted out a video](#) of the sub being tested in a California high school’s swimming pool the next day. A day later, as the boys were actually being brought out of the cave by the rescue team, Musk [tweeted some more videos](#) of testing.

Around the same time, Musk said in a tweet that the mini-sub would arrive in Thailand “in about 17 hours.” It was already clear that it might be operational on the ground [after all the boys and their coach had been rescued](#). But Musk went anyways and bragged about it on social media:

What the hell is Elon Musk doing?! This entire series of events is baffling, not only to me but also to the rest of the internet. At first, it seemed curious that Musk would divert his attention away from [his sometimes struggling car company](#) and [his frankly super busy rocket company](#) to aid in a rescue operation on the other side of the planet just because somebody on Twitter asked him to.

But Elon Musk is a rich and powerful guy who can do what he wants. Maybe he could just write a check or give the rescue divers a free Tesla or something. It seemed downright nonsensical, however, when Musk built a damn kid-sized submarine and sent it to Thailand, where it might be completely useless. This absurdity was not lost on the media. Here’s a journalist responding to the buzz:

It’s hard to know exactly what Klippenstein’s statement about “humanitarian pledges” is referencing, but it might be Musk’s [promise to rebuild Puerto Rico’s power grid](#). That’s another project that [wasn’t as simple](#) as Musk flying in to a disaster zone with some gadgets and fixing everything in a day.

But this point about building viral buzz around his ideas is a salient one. Musk is a new kind of showman, someone who commits himself to absurd but headline-grabbing goals on a regular basis. A couple years ago, the guy told a room full of experts that SpaceX [would build a “self-sustaining city”](#) on Mars in the 2020s. He even made [a promo video](#) for the “interplanetary transit system” that would send entire populations of people to the Red Planet in our lifetimes. Then you add other pie-in-the-sky projects like the Hyperloop [connecting major American cities](#) and the Boring Company [putting highways underneath Los Angeles](#).

The press loves to cover these announcements, even when there is very little evidence that Musk can keep his techno-futuristic promises. Gizmodo is no exception. We breathlessly covered [the saga of SpaceX, its reusable rockets, and drone barge](#). We flipped out, [however skeptically](#), when he revealed his Hyperloop idea. We even [took Musk seriously](#) when he said he was going to go to Mars. At a certain point, however, Musk the showman stopped being cute and started seeming like the world’s most annoying bullshitter. It certainly didn’t help earlier this year when Musk decided he hated journalists and [wanted to start a website](#) where random people could rank them. So far, Musk’s new Yelp for journalists website does not exist.

Yesterday 9:50AM

The weird difference between some of Musk’s famous vaporiffic moonshots and the kid-sized submarine is that Musk actually built the sub. But it’s nothing more than a useless stunt. Not only did Musk show up too late to help, he showed up with a tool that wasn’t even helpful. As it seemed increasingly obvious that the sub wouldn’t actually rescue any boys from the cave, Musk later tweeted that it “could also be used as an escape pod in space.” So at least there’s that non-existent contingency.

What’s most frustrating about Musk’s stunts is how everything feels a little bit like a grift. Like, every time, you have to wonder what Musk is really selling, and as time goes on, those sales pitches become more convoluted. The Mars thing was a great way to build publicity for SpaceX. The Hyperloop fiasco seems like some sort of weird ad for Tesla and the future of transportation. The Boring Company, [complete with promotional flamethrowers](#), is a different version of a Tesla ad. But with this kid-sized submarine, it’s not immediately clear what Musk is shilling.

Perhaps, at long last, Musk is just advertising his own ego. Musk, the man who does things, is here to outdo himself, and lucky you get to be his audience. The kid-sized sub was never the point of this latest stunt. Musk just wanted to remind his fans that he’s the man who makes things happen, often with the help of technology, money, and bluster. Just like Tony Stark. Keep those fawning comparisons coming, too. Musk is very serious about about the idea of being a real-world Iron Man.

**Update:** In a series of tweets, Musk insisted that his capsule would have worked:

The apparent exchange pictured is between Musk and Dick Stanton, one of the first British divers called in to help with the rescue, doesn't exactly prove that Musk is right. Meanwhile, it's unclear why Musk claims that the former Thai provincial governor, whose name is Narongsak Osatanakorn, is not the "rescue chief." Osatanakorn [is identified in the press](#) as the head of the joint command center coordinating the operation and has been issued regular updates about the rescue as it was unfolding.

It's quite possible that Musk is trying to delegitimize Osatanakorn, because he's the one who said that the kid-sized sub [was "not practical"](#) for the rescue. But who knows. Elon Musk is a man who's hard to understand.

# EXHIBIT 18



## Elon Musk hits back at criticism over inserting himself in Thai boys cave rescue

*Christopher Brennan*

Billionaire businessman Elon Musk has defended against allegations that he needlessly inserted himself into the plight of the Thai soccer team stuck in a flooded cave.

Narongsak Osottanakorn, who led the rescue effort that freed the 12 boys and their coach on Tuesday, said Musk's offer of a tiny, boy-sized submarine was "not practical" to use at the Tham Luang cave.

Musk had been following the boys' calamity, which started on June 23, and had a team of his engineers make the sub.

He posted on Twitter from the cave on Monday, and said he was leaving his creation there "in case it may be useful in the future."



In a tweet, Elon Musk shows a "tiny kid-sized submarine" being tested in a pool in California. (AP)

Some internet commentators took Musk's motives as purely self-focused, given the flood of media attention to the Wild Boars team and international rescue effort.

"This reaction has shaken my opinion of many people. We were asked to create a backup option & worked hard to do so. Checked with dive team many times to confirm it was worthwhile. Now it's there for anyone who needs it in future. Something's messed up if this is not a good thing," he posted on Twitter Wednesday.

He posted an email showing that he had been asked to continue with his project on Sunday by someone involved with the dive rescue teams.

Musk also recently decried being called a "billionaire" and said the label is "almost always meant to devalue & denigrate the subject."

The PayPal co-founder has a net worth of \$20 billion, according to Forbes.

- [Elon Musk](#)

# EXHIBIT 19

## The New York Times

# Thai Navy May Put Elon Musk's Mini-Submarine to Use. One Day.

By Muktita Suhartono and Julia Jacobs

July 12, 2018

MAE SAI, Thailand — Thailand may have use for Elon Musk's "kid-sized" submarine after all.

The tech billionaire had designed the miniature submarine, built with rocket parts, to help save the 12 boys and their 25-year-old soccer coach trapped in a flooded cave in northern Thailand. On Tuesday, rescuers pulled off an improbable feat when they finished removing all 13 people from the Tham Luang Cave.

They saved the soccer team without the help of Mr. Musk's submarine, which was built by engineers from his companies who traveled to the remote area of Thailand starting on Saturday.

The chief of the rescue mission had called the device "not practical" for the operation, which required squeezing through narrow passageways in the cave, but a Thai military official said the mini-submarine could be useful for future rescue missions.

Maj. Gen. Chalongchai Chaiyakham, the deputy commander to Thailand's Third Army, said Wednesday that the mini-submarine would be appropriate for use in open water and that he had heard the technology would be given to the Thai Navy SEAL team.

In a tweet on Thursday, a translator based in Bangkok said engineers from SpaceX, Mr. Musk's rocket company, trained members of the Thai Navy to use the mini-submarine.



Divers tested a miniature submarine designed to help save the soccer team trapped in a flooded cave in Thailand. A Thai military official said the navy may use the device in future rescues. Elon Musk on Twitter, via Associated Press

Dozens of Navy SEALs were involved in the rescue effort, and last week, a former Thai Navy SEAL lost consciousness and died while placing air canisters on a route within the cave being used in the rescue effort.

A Boring Company spokesman said the SpaceX engineers met with members of the Thai Navy on Wednesday and that the last employees left Thailand on Thursday morning. Mr. Musk responded to the photos of the training session on Twitter, saying the engineers were also getting feedback from British divers on how the technology could be improved.

Mr. Musk sent 10 engineers from SpaceX; Tesla, his electric car company; and the Boring Company, which specializes in tunneling and construction.

As the Thai government celebrated the success of the mission and considered how they could use Mr. Musk's quickly assembled invention, the 12 boys and their soccer coach were recovering under quarantine in a hospital in Chiang Rai, Thailand. All were improving quickly, the country's top public health official had said.

# **EXHIBIT 20**

# **‘Time is running out’: Inside the treacherous rescue of boys trapped in a Thai cave - The Washington Post**

*Shibani Mahtani*

The call “Fish on!” echoed off the stone, alerting rescuers up and down the passage that their treacherous mission was underway.

“That was the code word that somebody was coming up,” said the officer, who spoke to The Washington Post with permission from his superiors on the condition that he not be identified.

The first boy would emerge from the water in 10 minutes. “Everybody’s heart stopped,” he said.

It was the moment that they had all been waiting for, but that no one had wanted. It meant that no new exit would be discovered, or drilled, and that the members of the Wild Boars soccer team, who ranged in age from 11 to 16, and their 25-year-old assistant coach could not leave any other way. The relentless rains were pumping daily deluges into the tunnels, constantly threatening to overwhelm the battery of borrowed pumps and swamp the boys’ tiny refuge as a horrified world looked on.

[New video from Thai navy shows the scene inside Tham Luang cave during dramatic rescue](#)

It meant the very air had begun to fail, with oxygen levels falling to near-blackout levels. It had all come down to this last, best, terrible option that planners assumed would mean the death of least some of the boys, none of whom could swim. It meant pulling a terrified child through the frigid waters of the cramped, flooded, 2.5-mile-long gantlet that had already killed one expert diver.

“You could hear everybody stop breathing,” the officer said.

The first boy would make it out, but would he make it out alive?

‘I couldn’t see anything’

The unprecedented rescue operation that gripped the world and overwhelmed this mountainous outpost in northern Thailand for three weeks — recounted here based on interviews with more than 30 participants — began June 23 with a flurry of texts messages: A lot of sons were late for dinner.

Nopparat Khanthavong, the 37-year-old coach of the Wild Boars, knew his assistant coach had taken some of the younger players out for a Saturday bike ride while he watched his older team play.

After the final whistle, Nopparat checked his phone and saw at least 20 worried messages from his players’ parents asking why the bike riders had not returned.



When he learned that the children had persuaded his assistant to take them into the six-mile-deep Tham Luang Nang Non cave, he headed that way. The cave was popular, but Nopparat, standing under a darkening sky, knew that the rainy season was no time to be in those endless, flood-prone passages.

He stopped to consider the abandoned bicycles around the entrance and the worsening precipitation rushing down a lushly wooded mountain slope. He raced in, screaming the names of his assistant and the boys.

"I had no flashlight," Nopparat said. "In just a few meters, I couldn't see anything."

But soon he did see lights, coming out from the deeper recesses. It wasn't his team; it was a group of park employees who also had seen the bicycles and gone to investigate.

"If your players are in there, they are trapped," one told him, imploring him to calm down. Several hundred meters down the winding, narrowing passages, they had found water, blocking the way and rising quickly.

When Napasorn Taturkarn's phone rang, the mayor of Baan Moo 9 was with a group of neighbors. They were practicing Thai music for the funerals and weddings she plans for the village of 700 houses less than two miles from the cave's entrance.

It was her friend, Nopparat. "I think my boys are in the cave," he said. "Can you help?"

The first responders to a crisis that would soon captivate millions were the musicians in her yard, Napasorn said. At the cave's entrance, they found Nopparat pacing frantically in the fading light.

"He looked very concerned," Napasorn said.

While Nopparat and the village residents made another trip in, Napasorn called the Siam Ruamjai, the local volunteer emergency squad based in a pink building a few miles down the main road.

"I've been in the cave before," said Niwat Tumploy, 27, who took the call. "But only when it was dry. In the rains, that is a bad place."

Ten volunteers jumped in an ambulance and the back of a pickup. At the cave, five joined the growing crowd at the entrance; five went in, including Niwat. The rain had become a torrent. Water in the passage was up to their ankles even before they reached the watery impasse. Within two hours, it would be nearly up to their waists.

"There was nothing we could do," Niwat said. "We needed the big guys."

[The extreme leadership that got the Thai soccer boys out of the cave alive](#)

'Time is running out'

The governor of Chiang Rai province, Narongsak Osatanakorn, weeks away from being transferred to another part of the country, was getting ready for bed when he got word of the missing kids. He assumed it was "just some boys in the cave, no big problem," he told The Post.

But after changing from pajamas to drive the 38 miles to the cave, he knew

differently. Within hours, the first members of the Thai navy SEAL team arrived and went into the water.

Thai SEALs practice rescues in open water. They were unprepared for dark, muddy currents running between sharp rock walls. Feeling their way along the jagged edges, they had to turn back. A bigger group tried again, but when they reached an intersection in the narrow passage, they were baffled. The cave was a maze, and the water was rising.

“We could not fight with the weather or the water anymore,” said Aparkorn Youkongkaew, the Thai navy SEAL commander in charge.

A radio reporter arrived from Mae Sai; word began to spread. By daylight, local people were bringing food — a corps of volunteer cooks that would swell to more than a hundred. A truck arrived with a small industrial pump, which workers carried to the edge of the flood, the right idea at the wrong scale.

“They were pumping, but they were not enough to handle so much water,” said Kobchai Boonyaorana, a Thai disaster management official. “The rains were getting harder. We needed more.”

The call for pumps went out, and they began to arrive from all over the country. Worawut Imchit drove overnight from a shrimp farm 850 miles to the south, four flatbed trucks carrying four of the massive pumps that circulate water through the ponds.

“It was three sleepless days for me,” said Worawut. “I ran like a crazy man, up and down, back and forth between the pumps to make sure everything was functioning normally.”

Within three days, more than 40 machines had arrived, Kobchai said. At more than 400,000 gallons an hour, the pumping power stabilized the water level, and lowered it on drier days. Downhill, it flooded the fields of 128 farmers, destroying their rice harvests for the year.

Inside, divers said they worked without any sense of day or time in the all-consuming darkness.

As teams got deeper into the cave, radio links broke. The teams resorted to hand-carried notes, messengers running and swimming the communiques in relays. Commanders lost touch with their men for hours at a time.

Asaf Zmirly, an Israeli living in Bangkok, arrived with radios flown in from Israel that could operate within the cave, adjusting to the topography and creating a daisy-chain-like network. Just the shallow foray he made into the water to establish the system was daunting.

“If you look to your right or the left, the mask will be pulled off your face,” Zmirly said.

Even when they could talk to each other, searchers did not know where to look or how to find their way. The SEALs would find themselves essentially lost after hours-long dives, with still no sign of the young boys. On June 27, fast-rising waters filled the cave — so fast that it was the equivalent of a house flooding in 10 minutes.

“Our three hours of draining became nothing,” the Thai navy commander said.

They found help from an unlikely expert.

Vernon Unsworth, a British insurance consultant and hobbyist spelunker, has made an obsession of the Tham Luang cave system. He had explored miles of it over a decade, planning his travels between England and Thailand around the rainy season. He was convinced that the Thais were looking in the wrong place. Unsworth had strong views on where to look and who should be doing the looking.

“Time is running out,” he wrote in a letter to the governor, according to Unsworth’s wife. He listed the names of three British cave divers he pegged as the best in the world. “Please contact them through UK Embassy ASAP.”

### [Meet the British ‘A-team’ divers at the center of Thailand cave rescue](#)

The Thai government agreed.

Within days, his Brits were in the cave, and a search that most had given up as futile took an electrifying turn.

On July 2, Rick Stanton, a former firefighter, and John Volanthen, an IT consultant, used Unsworth’s maps to reach a chamber more than 2.5 miles from the entrance. When their headlamps emerged from the water, they reflected in [13 pairs of eyes](#) that had not seen sunlight in more than 200 hours.

The boys and their coach were alive after nine days of pitch-black isolation, six without any food. Clinging to a slippery slope 15 feet above the current, they had licked water droplets from the limestone walls. Their assistant coach, Ekapol Chanthawong, a former Buddhist novice monk, taught them to meditate to keep them calm.

“How many of you? Thirteen? Brilliant,” Volanthen said. He assured them: “Navy SEALs will come tomorrow, with food and doctors and everything.”

Instantly, a search had turned into a rescue. Hundreds of volunteers and military personnel clogged the mountain roads to the cave, an ad hoc battalion of experts and adventurers from around the world.

More than 1,500 journalists descended on the small town of Mae Sai, racing to feed an insatiable interest in the scrappy teammates, some of whom were stateless migrants from a lawless region of neighboring Myanmar. The boys, assumed lost, now had a fighting chance to make it. Their families, who had been keeping vigil in a muddy encampment outside the cave, were jubilant.

### [Rescuing Thai boys trapped in flooded cave will be a challenge](#)

Piyada Chermuen, 16, came from the same village in Myanmar as Adul Sam-on, the English-speaking boy able to communicate with the British divers. They lived in the same Christian church with 20 other refugees, most of whom were sent to Thailand by their parents so they could go to school.

Adul, 14, one of the Wild Boars’ best players, speaks five languages.

“We were praying for him when the teacher ran in and said they had been found,”

Piyada said. Outside her classroom, a string of photos of Adul hung like prayer flags. "Thank God. We cheered so loud."

At the cave, activity exploded. Thai police set up satellite parking areas and shuttled volunteers — who came to number more than 9,000. Commanders established one-way traffic lanes within the cave. Deeper in the chamber, four SEALs kept watch on the boys as their comrades ferried in field rations and water.

Ideas came from every corner: a network of corrugated pipes the boys could crawl through; floating them out in body bags. Billionaire entrepreneur Elon Musk began construction of a custom kid-size minibus.

But rescuers were focused on three possibilities: diving, drilling and waiting.

Multiple crews scoured the slopes for a spot to bore an access hole. After testing more than 100 sites, only 18 were deemed even remotely viable. And even drilling into the right hole could cause a deadly cave-in.

Waiting out the rains was quickly dismissed by many of the rescuers. Unsworth cautioned them that flooding from northern Thailand's monsoon season can last into winter, raising the possibility that the kids and their guardians would be perched on the cold, dripping slope for five months. Feeding them would require some 2,000 meals. And oxygen was proving to be a critical need just two days in. With more adults in the cave, O<sub>2</sub> levels were dipping.

Saman Kunam, a retired Thai navy diver, was working to fix that on the night of July 6. He and his team were staging tanks of oxygen along the flooded passage, with tubes to pipe it to the boys' chamber. Navy commanders paced outside the cave's mouth as hours dragged by without word from the team. The divers finally emerged seven hours later, carrying a lifeless body: Saman's own tank had run out.

After [officials announced his death](#) at a morning briefing, even some of the boys' families questioned the viability of having their sons dive out. They suggested that waiting for the dry season might be best, Nopparat, the coach, told The Post. The jubilation that erupted after the boys were found drained away.

Prayuth Jetiyanukarn, the robed abbot of the hilltop Buddhist monastery where the assistant coach often slept, penned a short letter to the young man, slipped it in a plastic tube and gave it to a Thai diver who promised to carry it in.

"Be patient. Try to build your encouragement from the inside," it read, according to the abbot. "This energy will give you the power to survive."

Save most or lose all

Inside the cave, though, were 12 soccer players, still trapped in deteriorating conditions. Preparations for a water exit were building.

Rescuers built a mock-up of the tight passage with chairs. They practiced with local boys of the right size in a school swimming pool, perfecting the muscle memory they would need in the cave, said the U.S. Air Force officer.

Inside the cave, the boys and their coach told their rescuers they were ready to go.

"They were the ones who needed the least convincing," said U.S. Air Force Maj.

Charles Hodges, who led the American team and was so new to his posting that his belongings had not yet arrived in Okinawa, Japan.

On July 6, the American military and Thai SEALs took a jointly concocted plan to senior Thai government officials. The interior minister was among those who arrived at the cave entrance by motorcade. Using Unsworth's maps and his understanding of the chamber's topography and hydrology, the rescuers pressed their point to about 60 representatives from the civilian government: It was time to act, even though they fully believed that some of the boys would not survive the swim. Their message: Save most of them now or lose all of them soon.

"You can wait until that finite window of time is over," Hodges said he told Thai officials, "and I can almost guarantee you that all of them will die."

The Thai interior minister requested that Hodges and about eight others go into a private room. He wanted to hear their plan again. Hodges explained the mission's two parts, emphasizing that it would take an entire day of preparation before the first boy would be pulled through the water. The Thais would continue to search for a drilling site if the diving plan failed.

They got their green light.

On July 7 — two weeks to the day after the boys went missing — the rescue plan, while not publicly acknowledged, was underway.

Air tanks were stashed along the muddy passageways, enough for the 12 boys, their coach, the four SEALs who had embedded with them, and the 18 divers who would carry them out. Riggers strung a web of static ropes for hoisting the cocoon-like stretchers that would carry the boys over vast fields of jagged rocks.

By 10:30 a.m. on July 8, the core team of 18 divers was in the water: Among them, Brits, Thai SEALs and diving buddies from the Gulf of Thailand beach resort of Koh Tao.

One group made its way to the final chamber. By the time the divers emerged, the players and Coach Ek, as Ekapol was known, had elected the boy who would go first. Officials have refused to identify him, but friends and parents said he was Mongkol Boonpiem, a 13-year-old with a lucky name: "the auspicious one."

The wet suit, the smallest they had, still did not cling to his emaciated frame as it should have. They readied the mask, attached to a tank filled with 80 percent oxygen. The rich mixture would saturate his tissues, making him easier to revive if he stopped breathing.

Richard Harris, an Australian anesthesiologist and cave diver, gave the boy a final assessment. The boy was given what Thai and American participants described variously as a muscle relaxant or anti-anxiety medication. A panic attack in a chokepoint no bigger than a manhole would almost certainly be fatal.

Finally, the boy was swaddled in a flexible plastic stretcher — akin to a tortilla wrap, Hodges said — to confine his limbs and protect him from the cheese-grater walls. And then, with his teammates watching, they pulled him under the murky water.

The original plan had called for two divers — one in front of the stretcher, one behind.



But that configuration was scrapped as too bulky for the shoulder-width passages and elbow turns.

“Having that second person provided you nothing,” the U.S. Air Force officer said.

Instead, a diver kept the swaddled boy in a body-to-body clinch for as much of the swim as possible, the officer said, handing the boy over to a fresh diver after his designated stretch. Keeping the child warm was critical.

“Even then the divers would get cold,” the Air Force officer said. “That is a lot of time in the water, and water is constantly running in there because of the flow, so that pulls that body heat away even if you have a wet suit.”

The worst portion of the swim was the last one, a deep tubular swoop that held the water like a sink trap. All told, it was a grueling two-hour trek through muck-filled passages.

“It is crawling through mud and underwater tunnels, and you can’t see your hands,” said Erik Brown, a Canadian diver who was among the 18.

But it was the end of the deadliest part.

“Fish on!”

The divers lifted the boy, and the crew at the edge of the water pulled him out. Their dry, final passage out was lined with more than 100 rescuers. One of them, the U.S. Air Force officer, put his ear to the boy’s mask.

He was breathing. And now, the rescuers could, too.

“It was a huge weight off our shoulders,” the officer said.

‘It was a little dicey’

They got three more out that day, four the next and five on the last. They were hard to distinguish with their face masks, apart from Coach Ek, who still had his wolf-shaped ring on a finger. With each repetition, they grew more efficient.

On July 10, a helicopter’s lights shone down on the town of Mae Sai, its whirl breaking through the night sky. Celebrations erupted — the last boy was alive, on his way to the hospital. Rescuers cracked open beers, hugging and trading high-fives.

Then they caught themselves. Four Thai navy SEALs were still in the deepest chambers, making their way out after volunteering to keep vigil with the boys.

Disaster almost struck.

The pumps had held the water at bay until the last moments, when one of the industrial-size hoses burst, pouring water back into the cave. Rescuers still inside, along with the four divers, made a run for it.

“Guys started diving down this hill and trying to get out,” said the Air Force officer, who was the very last person out of the cave. “It was a little dicey.”

In town, drivers honked car horns in the streets. Family members rushed to the



eighth floor of the hospital in the city of Chiang Rai, an hour away. There, crowds gathered behind barriers flanking the entrance and cheered every arriving ambulance. Inside, doctors declared the Wild Boars in good health overall, releasing video of them waving from their group ward.

After more than two weeks together in darkness, they were still side-by-side in the bright fluorescence of a welcoming world.

*Correction: An earlier version of this story misstated the number of days the soccer team was trapped in darkness. It was 16 to 18 days.*

Panaporn Wutwanich, Jittrapon Kaicome and Katcha Rerngsamut contributed to this report.

# EXHIBIT 21

**Transcript of July 13, 2018 Interview with CNN**

**Interviewer:** We just talked about this before, what your thoughts on Elon Musk's idea was?

**Mr. Unsworth:** He can stick his submarine where it hurts. It just had absolutely no chance of working. He had no conception of what the cave passage was like. The Submarine, I believe, was about 5 foot 6 long, rigid, so it wouldn't have gone round corners or round any obstacles. It wouldn't have made the first fifty meters into the cave from the dive start point. Just a PR Stunt.

**Interviewer:** But he went into the cave, Tuesday?

**Mr. Unsworth:** And was asked to leave very quickly. And so he should have been.

# **EXHIBIT 22**



Elon Musk @elonmusk · Aug 28, 2018

Replying to @yoda and 2 others

You don't think it's strange he hasn't sued me? He was offered free legal services. And you call yourself @yoda ...



Lin Wood

@LLinWood

@elonmusk should check his mail before tweeting.

**L. LIN WOOD, P.C.**  
TRIAL LAWYERS

L. LIN WOOD  
Direct Dial: (404) 891-1406  
lwood@linwoodlaw.com

August 6, 2018

**VIA FEDEX & ELECTRONIC MAIL**

Mr. Elon Musk  
10911 Chalon Road  
Los Angeles, CA 90077  
elon.musk@spacex.com

RE: Defamation of Vernon Unsworth

Dear Mr. Musk:

I have been retained by Vernon Unsworth to represent his interests in connection with the publication on your Twitter account of false and defamatory statements conveying that Mr. Unsworth is a pedophile. More specifically, you published through three different tweets to your twenty-two million followers that Mr. Unsworth engages in the sexual exploitation of Thai children, and you did so at a time when he was working to save the lives of twelve Thai children. You did so without any basis. According to a subsequent Twitter post, you did so out of anger.

I am in the process of preparing a civil complaint for libel against you. In an attempt to avoid litigation and to see the public record corrected, I invite you or your legal representatives to contact me.

♥ 3,190 4:17 AM - Aug 29, 2018



💬 700 people are talking about this



# **EXHIBIT 23**



**To:** Adam Fellows[Adam.Fellows@howardkennedy.com]  
**Cc:** Mark Stephens, CBE[Mark.Stephens@howardkennedy.com]; David Hooper[David.Hooper@howardkennedy.com]; Elizabeth Morley[Elizabeth.Morley@howardkennedy.com]; Hugo Mason[Hugo.Mason@howardkennedy.com]  
**From:** vernon\_unsworth@yahoo.co.uk  
**Sent:** Wed 6/26/2019 7:23:17 AM  
**Subject:** Fw: Description



----- Forwarded message -----

**From:** Vernon Unsworth <vernon\_unsworth@yahoo.co.uk>  
**To:** Jonathan Head - Bangkok <jonathan.head@bbc.co.uk>  
**Sent:** Monday, 16 July 2018, 07:26:57 BST  
**Subject:** Re: Description

Call me on LINE when convenient  
Cheers  
Vern

---

**From:** Jonathan Head - Bangkok <jonathan.head@bbc.co.uk>  
**To:** "vernon\_unsworth@yahoo.co.uk" <vernon\_unsworth@yahoo.co.uk>  
**Sent:** Sunday, 15 July 2018, 5:58  
**Subject:** Re: Description

Many thanks Vern. Will keep it to myself. See you on Wednesday.

Jonathan Head  
BBC SE Asia Correspondent  
Tel: +662-652-0500  
Mob: +668-9944-6648

On 15 Jul BE 2561, at 11:52, Vernon Unsworth <[vernon\\_unsworth@yahoo.co.uk](mailto:vernon_unsworth@yahoo.co.uk)> wrote:

Hi Jonathan  
For your eyes only and not to be reported on !!! It gives an excellent feel for what was happening.  
Hopefully you will understand why Elon Musk's submarine would not have worked.  
Regards  
Vern

[Sent from Yahoo Mail on Android](#)

----- Forwarded message -----

**From:** "Vernon Unsworth" <[vernon\\_unsworth@yahoo.co.uk](mailto:vernon_unsworth@yahoo.co.uk)>  
**To:** "Richard Stanton" <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
**Cc:**  
**Sent:** Sun, 15 Jul 2018 at 9:37  
**Subject:** Re: Description  
Hi Rick

Thanks for this, much appreciated.



Hope u r well.

Kind Regards  
Vern

---

**From:** Richard Stanton <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
**To:** [Vernon\\_unsworth@yahoo.co.uk](mailto:Vernon_unsworth@yahoo.co.uk)  
**Sent:** Saturday, 14 July 2018, 15:24  
**Subject:** Description

From where the children were located, there was a mud bank in the main passage opposite the alcove that lead up to the area where the team found shelter from the flood water.

It was on this mud bank that we de-knitted our equipment before swimming across to the children.

We installed a metal spike as an anchor and a knotted rope to assist in climbing up the steep ramp then on our second trip there.

On the return journey from here with the children in tow there was initially a 50 m surface swim in a large passage followed by 300m of underwater tunnel that passed through the area known as Pattaya Beach (which offered no shelter as far as we could see).

This section of passage was generally wide and lowish especially around the inside of bends where care had to be taken.

The first airspace was encountered at staging area 8 which was a swirl chamber with a dry gravel mound in the middle of the 8m diameter 2 m high chamber.

Here the children were assessed after their first passage of an underwater section.

Their diving masks were removed then they were transported on the stretcher across the gravel and sand banks, then through water from 20cm to 150cm deep water to a boulder area which lead to area 7.

On the dive when we found the children this area was sumped, but by the time of the evacuation it was possible to walk between the two areas without diving. The distance was approx 150m. We had two dedicated stretcher handlers Klaus and Mikko stationed here to help.

At 7 the children were re-fitted to the diving mask for swims and dives totalling 250m in generally rift type passage, past the junction with Monks passage. There were a few low restrictions.

Beyond Monks inlet there were more canals in the southern heading passage for floating the children along before a short dive to the canal section known as 6 where the cave turns to the east. This area along with the canals is all appropriately 2.5 m in diameter with water from 50 cm to 150cm depth.

People assisted with floating the children though to the next dive area.

This was short and lead to the canals of staging area 5 where again people helped with towing the children along the deep canals.

The next major dive of 150m was complex, mainly navigating in the roof of the tunnel with many obstructions of stalagmites etc.

This lead to the large dry chamber number 4 where there was an off route dry sandy beach. We generally did not use this except it could have been useful if there had been a problem.

Instead we usually continued to dive the further 150m directly to the safety of the Third chamber where we could hand the children over to the SEAL teams.

This dive was the most complex, again navigating around stalagmites with some challenging narrow sections. Also hampered by phone and electrical cables as well as hoses from the pumps.

The journey time was 90 minutes from starting with the children at 9 to arriving at the Third chamber.

Total distance from the children to chamber 3 was approx 1500m.

There are no photos taken by us of any passage during our time there.

Sent from my iPhone

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# EXHIBIT 24

## The BuzzFeed News Standards And Ethics Guide

We published this guide to keep BuzzFeed News writers, reporters, and editors accountable to our readers.

Originally posted on January 30, 2015, at 2:58 p.m.

Updated on January 5, 2018, at 9:02 a.m.

[Be one of the first to comment](#)



**Shani O. Hilton**

BuzzFeed Head of US News



# Standards and Ethics Guide

BuzzFeed News has the opportunity to help shape a new set of standards for a new generation of media. We are offering these standards to our staffers and to our readers as a first attempt at articulating the goal of merging the best of traditional media's values with deep shifts in the forms of media and communication. Our intent with this document is to provide context and support for BuzzFeed News staffers in making smart, responsible, and ethical choices as we tell the most honest, troublemaking, revelatory, heartwarming, gripping, and entertaining stories we can.

These standards were shaped in conversations with our writers and editors and colleagues in the industry, and we expect them to evolve as they're tested. BuzzFeed News is still growing up too, and these are aimed at helping us on our way, and at reflecting the kind of media company we want to be. We are making this document public to keep BuzzFeed News' writers, reporters, and editors accountable to our readers.

The document is separated into four sections: 1) Sourcing, 2) Corrections, Updates, Deletions, and Errors, 3) Legal and Ethics, and 4) The Editorial and Business Relationship. The guidelines in this document apply to BuzzFeed's global news operation for entertainment content.

Finally, this guide is intended to provide principles rather than offer specific answers to every possible ethical question that arises. Writers and editors make tough editorial decisions every day, and the hardest and most important calls rarely have obvious answers.





## Sourcing

### Embeds

We often embed Instagram images and tweets in news and entertainment. But in the case of sensitive subjects — sexual assault, LGBT issues, and racial bias, for example — we should be aware and respectful of the fact that many ostensibly public Twitter users consider themselves part of distinct communities. *Outside of breaking news situations*, writers are encouraged to contact Instagram and Twitter users when embedding a photo or a tweet on a sensitive subject. Contacting the user has the added benefit of giving the story more context for the reader. In cases where identifying the user is inappropriate but the content is still newsworthy, screenshots with the name and image blurred are fine.

### Fact-Checking

Fact-checking can be provided for deep narrative features and investigative projects. Reporters are expected to be accurate, and editors are expected to flag any questions they have for their writers before publishing. Additional accurate information can always be added after publishing — removing bad information is more difficult (see Corrections and Updates for more information).

### Information and Facts

Information — excluding common knowledge — should come from a verified source. Wikipedia, IMDb, and other websites that anyone can edit should never be used as sources in a story; they are places to begin research, not to finish it. Acceptable verified sources include interviews, legal documents, research by experts, academic journals, databases, and, with attribution, stories from trusted news organizations.

### Plagiarism

To plagiarize is to trick the reader. Nothing may be copied, pasted, and passed off as one's own work, including press releases.

### Polls and Other Studies

When considering reporting on a study or poll, ask these questions: Have the authors included a detailed methodology? How many people did they study? (For most studies, be skeptical of anything below 100; for polls, anything below 1,000.) Do the authors have any conflicts of interest? For medical studies: Was the study performed on humans, or other animals? (Drugs, for example, that work in mice might fail in humans.) For polls: How, precisely, were the questions worded? Never take information directly from a press release. Instead, ask the authors for a copy of the actual study or poll. When you're asking readers to vote for fun, don't suggest that results reflect a scientific sample. The data journalism team is available to assist staffers who have questions about data.

### Press Releases

Reporters may quote from press releases and should make the source clear — "said in a press release." With that said: Interviews are always better.

### Quotes

- *Anonymous quotes:* Anonymous quotes are permitted, though writers should always try to get a source on the record before agreeing to let them be anonymous. Staffers should spell out why their source is anonymous and include an explanatory line in the story that the reader will understand. When possible, writers should share the source's identity with their editor, unless it's a very extreme case, in which case the editor-in-chief should be consulted prior to publication. We don't have an arbitrary number of anonymous sources required to verify a story: One well-placed anonymous source is worth more than four anonymous sources who are all repeating the same rumor.

Writers should also take precautions not to reveal the identity of confidential sources, including avoiding putting a source's name in writing on unsecured channels.

- *Attribution:* All quotes are to be attributed. Quotes that have been given directly to a BuzzFeed News staffer should be noted as such by using the words "told BuzzFeed News" (or in some cases, "BuzzFeed Health" or "BuzzFeed Reader") at least once in the story. Quotes from other outlets should be attributed to that outlet: "told the Guardian," etc., with a link to the article. Quotes that come from the wire services we subscribe to should also be attributed: "told the Associated Press" or "the Associated Press reported."
- *Quote approval:* As a general rule, BuzzFeed writers are not permitted to have quotes approved by sources or share story drafts with their subjects. As a courtesy, or to double-check their work, a writer may choose to call or email a source and describe how they are quoted in a story. "No surprises" letters are also a welcome way of letting sources and subjects know what will be in a story: Sending a note to the subject that includes allegations or a description of what will be published is a reporting tool that also acts as a safeguard for the reporter. There are rare exceptions to the quote-approval rule, particularly in countries where that practice is the norm — but writers should push back as a first response, and discuss with an editor before agreeing.
- *Quote disputes:* If a source disputes a quote as published, the writer and their editor may review the writer's notes and recordings to determine if the complaint is warranted. If warranted, the quote will be updated and a correction issued. If a source disputes the way their position was characterized, rather than a specific quote, an editor should determine whether the complaint is valid.



## Corrections, Updates, Deletions, and Errors

### Body Copy

Changes to body copy may require a notification to the reader via an update or correction. Stories that are ongoing with breaking news can be updated with information as it becomes available — by using either subheads with a manual timestamp or the breaking news template with an automatic timestamp to alert the reader to updates.

### Corrections and Updates

There are a number of ways to add updates for clarity and context to written news articles: using the update option in the CMS, writing through the body copy with the additional information, or adding the latest news to the top of the post. Consult with your editor to choose the best option.

Fixing incorrect copy should be done using the correction subbuzz. For full information on how and when to write corrections or updates, see the [BuzzFeed Style Guide](#). Corrections are flagged to the copydesk; if you have questions on wording or styling, email (or walk over and visit!) them for guidance.

Distributed platforms will not always offer these tools for corrections, but we should strive for clarity and transparency in the spirit of these rules, given the options the platform makes available.



News items should not be deleted for reasons related to their content, or because a subject or stakeholder has asked you to do so. If a technical issue arises — like a duplicate post or an incorrect URL — email bugs to your manager. If a post was published ahead of schedule, remove it from all site promotion and ask bugs to unpublish it for you. If two people inadvertently created a post on the same subject, both posts should be left on the site.

If some information in a post is incorrect or obsolete, it is acceptable to delete that information and add a brief correction or update explaining what was removed.

Getting hoaxed should be avoided through diligence and reporting, but if an entire post is incorrect or if it has turned out to be a hoax, 1) append “— Updated” to the end of the headline and note in the deck that the story is false, and 2) add a correction subbuzz to the top of the post. The rest of the copy may stand as it did originally.

There are two cases in which deletions may be necessary: First, on some distributed platforms, editing content is not an option, in which case content may be deleted and in some cases edited and reposted, with an explanation on that platform in either case. Second, in some countries, the law requires the deletion of content in some cases. In those cases, we will comply with local law.

The deletion process for Community posts differs from editorial standards. For more information, review our [Community Guidelines](#) and [Terms of Service](#).

## Display Copy

Updating display copy — headlines, decks, and photo captions — for clarity, spelling, or style does not require a correction. Factual errors do require a correction.

## Images

For information on updating images, contact the photo desk.

## Legal and Ethics

### Activism

We firmly believe that for a number of issues, including civil rights, women's rights, anti-racism, and LGBT equality, there are not two sides. But when it comes to activism, BuzzFeed editorial must follow the lead of our editors and reporters who come out of a tradition of rigorous, neutral journalism that puts facts and news first. If we don't, it makes it harder for those reporters to do their jobs.

### Allegations

Legal counsel should review stories with serious or potentially damaging allegations in them; if there is any doubt, do not hesitate to contact them. Writers are also encouraged to send a "no surprises" letter to subjects of investigative reports prior to publication, giving them time to comment. Any questions on how to word the letter should be run by your editor. For information on libel or conducting privileged conversations, contact general counsel.

### Animal Visitors

We seek to follow the Humane Society of the United States' suggestion that you should "never put an animal in a situation that you wouldn't want to see your newborn baby in." Staffers should never purchase or rent wild animals, or bring exotic animals into the office. When we have animal guests visiting, they should be treated like any other guest — i.e., their needs for food, water, rest, and personal space should all

## Awards

We are pleased when our colleagues' work is honored by their peers, and we apply for leading journalism awards. We do not apply for or accept awards from advocacy organizations we cover, and staffers should not apply for those awards — though if anyone chooses to call attention to or honor our work, we welcome it. If you wish to submit your work for an award independently, talk to your manager about it.

## Compensating Sources

We do not pay sources for interviews. If an interview incurs costs to a source through travel or work compensation lost, we may be able to reimburse them, but check with your editor before agreeing to do so.

## Conflict of Interest and Disclosure

If you're asking yourself, "Is this a conflict of interest?" it likely is. Readers are also a good barometer for this; take a moment to consider whether the reader would see a conflict of interest. Writers and editors should disclose if they have a financial or personal stake — Is the subject a friend or significant other? Have you disclosed this? — in the issue they are covering. Reporters should not have a financial stake in a company in the industry they cover. Check with your editor about whether disclosure is enough, or whether the story should be reassigned.

## Customer Service Complaints

Reporters and editors should not use their work-related email accounts, social media accounts, or other BuzzFeed-related platforms to seek customer service assistance. It's fine, however, to tweet in general about issues with, say, the subways or other private or public services, as long as you aren't seeking — or receiving — special treatment. For example:

*Okay:* "The face unlock on my new iPhone X never works."

"The seats on @FlyFrontier Airlines are too close together for normal human legs."

*Not okay:* "@apple, I can't get face unlock working on my iPhone X. Little help?"

"@frontiercares I paid for extra legroom but my knees are \*completely\* jammed up against the seat in front of me."

## Disclosing Provided Materials

We should note when items such as clothing or appliances have been furnished to us for review. When an item or items was/were provided and used in the test kitchen or as part of a photo shoot, but not reviewed, writers should disclose that at the bottom of the post.

Reporters and editors should not fundraise for organizations BuzzFeed News covers, with the exception of professional groups and organizations primarily advocating the defense of a free press. Reporters should not give money to groups they cover and while there is of course no reason not to give charitable contributions, staffers should obviously be aware that those may not remain private.

## Gifts

Gifts that aren't review material (books, music, DVDs) or edible typically should be returned or donated. A rough guide — though imperfect — for determining if you can keep a gift is whether the item costs \$25 or less. If it costs more than \$25, talk to your editor.

## Graphic Content

While it ultimately comes down to the calls of the newsroom managers on duty, we concluded that BuzzFeed.com is not an artificial wall between our readers and graphic content. Generally speaking, we will embed or link to the graphic content we are writing about. On our owned-and-operated platforms, we also have technical tools that give our readers the opportunity to opt in to view graphic content. Marking a post NSFW in the CMS prevents it from going into our 13+ BuzzFeed app.

- *Profanity:* We speak the language of the internet — which is often hilarious and often profane. As such, profanity is permitted on BuzzFeed; but see the BuzzFeed Style Guide for more information on how to style it responsibly.
- *Sex and nudity:* Nudity or sex should be avoided if it's prurient or pornographic. Newsworthy or artistic nudity or instructional sexual content can be posted as long as the post has been clearly marked NSFW in the deck and in the CMS.
- *Violence:* Images that show blood, gore, or violent abuse should be covered with the graphic overlay tool, allowing readers to click if they wish to see the images. These posts should be marked "sensitive" in the CMS. When covering extreme violence or death, use discretion when embedding — sometimes it's best to link out.

If you have questions about whether you should post something because of its graphic nature, talk to your editor and/or the manager on duty.

## Interviews

Giving a subject a general sense of the direction of the interview is fine, but we should decline to provide questions to subjects in advance of an in-person interview. Interviews conducted over email, Facebook Messenger, or Gchat are permitted — but in-person, video, and telephone interviews are often more valuable.

## Opinion

When BuzzFeed News publishes opinion pieces, they should be clearly labeled as opinion, both on the article page and in any social promotion. Our publication of these pieces does not mean an endorsement of the views contained within them. However, we seek to publish only opinion pieces that we believe were written in good faith, by people who we believe have a credible history of good-faith participation in the public sphere, and add a unique voice to the public debate around a topic of news value.

Our opinion section welcomes commentary from people with diverse political views, but it is not a place for trolls, dishonesty, or spin.

## Outside Income

BuzzFeed News staffers who make money for work done outside of the company should disclose that information when they are hired. We discourage most freelance writing because we love your work and would like to publish the best things you write on BuzzFeed, but there are occasional exceptions. If you're doing something BuzzFeed would publish — pretty much anything but a novel or a screenplay — we'd like to run it. Please consult your manager if you think we should make an exception, and we'll consider it on a case-by-case basis.

We try to accommodate all book deals and will in most cases offer up to six months of unpaid book leave. If you're thinking of writing a book, please consult your manager first. Contract work and paid speaking engagements will be considered on a case-by-case basis and should

Staffers are also not permitted to invest in companies they cover. BuzzFeed News staff may not buy, sell, or in any way trade in stocks based on stories BuzzFeed News will publish. Staffers may not short any stocks.

## Photography

Our original photography and image selection should not attempt to deceive the reader in any way. Subjects should be shown in the reality of the moment they are captured in. Materially manipulating images — such as reversing, distorting, or adding/removing people — is not allowed except in the cases of creating a photo illustration, which the caption will note. Minor adjustments to cropping, color, sharpening, etc., that do not materially change the photograph are permissible.

## Political Speech

Reporters and editors should refrain from expressing partisan opinions about candidates, policy, and other public issues that BuzzFeed News covers. News staffers are not permitted to donate money or volunteer time for political candidates or campaigns, or to participate in demonstrations.

We do, however, expect reporters to engage in conversations on social media, legacy media, events, and street corners on subjects in which they have expertise or interest. In all those contexts, reporters should avoid saying things they wouldn't say in a news article or broadcast — that is, statements they can't back with reporting. And reporters should generally consider the value of commentary that may make their colleagues' work harder on specific beats. (Culture writers, whose work may be more overtly political or opinionated, should hold their comments to the same standards they do in their work.)

## Privacy

Digital media — the ubiquity of recording, the vast quantity of speech on social media, the power of search — has changed how regular people think about the principles of free speech. We believe deeply in those principles and in our right to report public information. But we also believe journalists must adjust to changing norms, and focus on defending and defining the right to reveal the secrets that matter.

We expect our reporters to consider context in three categories of privacy decisions, and to be particularly sensitive when it comes to minors:

- *Search engine indexing:* In some cases, we may identify a person by a version of their name other than the one that is widely used in searches, or anonymize them entirely, if it can be done in a way that does not substantially distort the reporting and may protect that person from having, for instance, the worst day of their life perpetually define their online identity.
- *Social media:* We should be attentive to the intended audience for a social media post, and whether vastly increasing that audience reveals an important story — or just shames or embarrasses a random person. We should not automatically or even typically comply with a poster's original intention — but we should be aware of it.

## Products

BuzzFeed News writers can accept and may request samples of consumer products for evaluation or for photo shoots (as props or construction material). These materials should stay at the office or at BuzzFeed's photo studios.

BuzzFeed News staffers should request media that they are potentially interested in writing about (books, screeners, albums, etc.). Physical materials are often provided for review purposes, like concert tickets, DVD screeners, etc.

## Pseudonyms

Freelancers and regular contributors should write under their own names or their professional pen names. We may make occasional exceptions for freelancers writing on important but sensitive topics, or for correspondents working on countries where journalism is dangerous or illegal. If you don't feel comfortable publishing under your own name, there are likely problems with the story that need to be addressed.

## Selfies

Selfies are fantastic and you should take them as often as possible with friends and loved ones. But BuzzFeed News reporters should use good judgment when taking images with their subjects. Ultimately, all staffers should answer this question when it comes to photographs: "Would taking a photo with this subject undermine the work I'm doing?"

## Source Meetings Over Meals or Drinks

BuzzFeed staffers should seek to pay costs incurred over the course of an interview or source meeting over a meal or drink.

## Travel, Junkets, and Set Visits

We are happy that we are able to send staffers to report and cover events. If there is a journalistic reason for a BuzzFeed News reporter to accept travel and/or lodging provided for or arranged by a source, BuzzFeed News will reimburse the source with an amount equivalent to what we would have paid for commercial travel. Where this isn't feasible, we will disclose where we've accepted travel or lodging.

## The Editorial and Business Relationship

BuzzFeed News relies deeply on the trust of our readers that we are bringing them accurate reporting, great storytelling, and useful service — and so we maintain a strict and traditional separation between advertising and editorial content.

## Ad Campaigns

We don't write about ads that are running on BuzzFeed unless they are genuinely newsworthy.

## BuzzFeed Entertainment Group

As BuzzFeed expands, we're going to be in more situations where BuzzFeed News is covering projects of people who have an affiliation with BuzzFeed Entertainment Group or other aspects of the company. When we're writing about someone who is affiliated with BuzzFeed Entertainment Group, we should disclose that relationship.

This should be done in italics at the bottom of a post in the following way:

**Case 2:18-cv-08048-SVW-JC Document 62 Filed 09/16/19 Page 264 of 299 Page ID #:841**

*Disclosure: [Name] is an adviser [or another title] to the BuzzFeed Entertainment Group, which is part of the same company as BuzzFeed News.*

### **BuzzFeed Investors**

Our investors have no influence on our reporting, and reporters should not take any special note of investors' views or interests. When we cover people who are investors in BuzzFeed, typically it is because of their other business interests. Editors, not reporters, are responsible for noting whether a subject is an investor. In those cases, we should disclose that relationship with a parenthetical sentence in the running text after mentioning their name: "*[Name/company] is an investor in BuzzFeed.*"

### **Cross-BuzzFeed Collaboration**

BuzzFeed News maintains a divide between advertising and editorial staff. However, management-level editorial employees may be asked to vet certain sponsorships or projects. Some forms of advertising — including video integrations and advertisements in podcasts — may also involve staffers' participation in a clearly disclosed form.

### **Distribution Partners**

BuzzFeed has business relationships with platforms ranging from social networks to television channels, under which BuzzFeed is paid for content, shares in advertising revenue against that content, or has some other arrangement. BuzzFeed News staffers should disclose these distribution relationships when we are writing about the specific product or program involved in the relationship. For instance, we should disclose that BuzzFeed has a Snapchat Discover channel when we are writing about Snapchat Discover as a product, or about Snapchat's strategy around media partnerships. It is not necessary to disclose this relationship at every mention of the partner. Editors, not reporters, are responsible for noting whether a subject is a partner.

## **UPDATE**

December 31, 1969, at 7:00 p.m.

This post now includes updated guidelines on customer service complaints, fundraising, and political speech, as well as new guidelines on privacy and opinion.

Shani Hilton is the VP of news and programming for BuzzFeed News and is based in New York.  
Contact Shani O. Hilton at [shani.hilton@buzzfeed.com](mailto:shani.hilton@buzzfeed.com).

Got a confidential tip? [Submit it here](#).

## **Create your own post!**

This post was created by a member of the [BuzzFeed Community](#). You can join and make your own posts and quizzes.

Exhibit 24, Page 239

[Sign up to create your first post!](#)

**BuzzFeed002-9**



News moves fast. Keep up with the BuzzFeed News daily email!

Your email address

[Sign up](#)

# EXHIBIT 25

## The BuzzFeed News Standards And Ethics Guide

We published this guide to keep BuzzFeed News writers, reporters, and editors accountable to our readers.

By Shani O. Hilton

Last updated on September 12, 2019, at 6:58 p.m. ET

Posted on January 30, 2015, at 2:58 p.m. ET



*BuzzFeed News*

BuzzFeed News has the opportunity to help shape a new set of standards for a new generation of media. We are offering these standards to our staffers and to our readers as a first attempt at articulating the goal of merging the best of traditional media's values with deep shifts in the forms of media and communication. Our intent with this document is to provide context and support for BuzzFeed News staffers in making smart, responsible, and ethical choices as we tell the most honest, troublemaking, revelatory,

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## BuzzFeed News The BuzzFeed News Standards And Ethics Guide

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more context for the reader. In cases where identifying the user is

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## Information and Facts

Information — excluding common knowledge — should come from a verified source. Wikipedia, IMDb, and other websites that anyone can edit should never be used as sources in a story; they are places to begin research, not to finish it. Acceptable verified sources include interviews, legal documents, research by experts, academic journals, databases, and, with attribution, stories from trusted news organizations.

## Plagiarism

To plagiarize is to trick the reader. Nothing may be copied, pasted, and passed off as one's own work, including press releases.

## Polls and Other Studies

When considering reporting on a study or poll, ask these questions: Have the authors included a detailed methodology? How many people did they study? (For most studies, be skeptical of anything below 100; for polls, anything below 1,000.) Do the authors have any conflicts of interest? For medical studies: Was the study performed on humans, or other animals? (Drugs, for example, that work in mice might fail in

humans.) For polls: How precisely were the questions worded? Never take information directly from a press release. Instead, ask the authors for a copy of the actual study or poll. When you're asking readers to vote for fun, don't suggest that results reflect a scientific sample. The data journalism team is available to assist staffers who have questions about data.

## Press Releases

Reporters may quote from press releases and should make the source clear — “said in a press release.” With that said: Interviews are always better.

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other outlets should be attributed to that outlet: “told the Guardian,” etc., with a link to the article. Quotes that come from the wire services we subscribe to should also be attributed: “told the Associated Press” or “the Associated Press reported.”

- *Quote approval*: As a general rule, BuzzFeed writers are not permitted to have quotes approved by sources or share story drafts with their subjects. As a courtesy, or to double-check their work, a writer may choose to call or email a source and describe how they are quoted in a story. “No surprises” letters are also a welcome way of letting sources and subjects know what will be in a story: Sending a note to the subject that includes allegations or a description of what will be published is a reporting tool that also acts as a safeguard for the reporter. There are rare exceptions to the quote-approval rule, particularly in countries where that practice is the norm — but writers should push back as a first response, and discuss with an editor before agreeing.

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## Deletions

News items should not be deleted for reasons related to their content, or because a subject or stakeholder has asked you to do so. If a technical issue arises — like a duplicate post or an incorrect URL — email bugs or your manager. If a post was published ahead of schedule, remove it from all site promotion and ask bugs to unpublish it for you. If two people inadvertently created a post on the same subject, both posts should be left on the site.

Case 2:18-cv-08048-SVW-JC Document 62 Filed 09/16/19 Page 273 of 299 Page ID #:850

If some information in a post is incorrect or obsolete, it is acceptable to delete that information and add a brief correction or update explaining what was removed.

Getting hoaxed should be avoided through diligence and reporting, but if an entire post is incorrect or if it has turned out to be a hoax, 1) append “— Updated” to the end of the headline and note in the deck that the story is false, and 2) add a correction subbuzz to the top of the post. The rest of the copy may stand as it did originally.

There are two cases in which deletions may be necessary: First, on some distributed platforms, editing content is not an option, in which case content may be deleted and in some cases edited and reposted, with an explanation on that platform in either case. Second, in some countries, the law requires the deletion of content in some cases. In those cases, we will comply with local law.

The deletion process for Community posts differs from editorial standards. For more information, review our [Community Guidelines](#) and [Terms of Service](#).

## Display Copy

Updating display copy — headlines, decks, and photo captions — for clarity, spelling, or style does not require a correction. Factual errors do require a correction.

## Images

For information on updating images, contact the photo desk.

## **Activism**

We firmly believe that for a number of issues, including civil rights, women's rights, anti-racism, and LGBT equality, there are not two sides. But when it comes to activism, BuzzFeed editorial must follow the lead of our editors and reporters who come out of a tradition of rigorous, neutral journalism that puts facts and news first. If we don't, it makes it harder for those reporters to do their jobs.

## **Allegations**

Legal counsel should review stories with serious or potentially damaging allegations in them; if there is any doubt, do not hesitate to contact them. Writers are also encouraged to send a "no surprises" letter to subjects of investigative reports prior to publication, giving them time to comment. Any questions on how to word the letter should be run by your editor. For information on libel or conducting privileged conversations, contact general counsel.

## **Animal Visitors**

We seek to follow the Humane Society of the United States' suggestion that you should "never put an animal in a situation that you wouldn't want to see your newborn baby in." Staffers should never purchase or rent wild animals, or bring exotic animals into the office. When we have animal guests visiting, they should be treated like any other guest — i.e., their needs for food, water, rest, and personal space should all be met. Handlers should accompany animals who come into BuzzFeed spaces, and staffers should always follow the guidelines that handlers lay out.

## **Awards**

We are pleased when our colleagues' work is honored by their peers, and we apply for leading journalism awards. We do not apply for or accept awards from advocacy organizations we cover, and staffers should not apply for those awards — though if anyone chooses to call attention to or honor our work, we welcome it. If you wish to submit your work for an award independently, talk to your manager about it.

## **Compensating Sources**

We do not pay sources for interviews. If an interview incurs costs to a source through travel or work compensation lost, we may be able to reimburse them, but check with your editor before agreeing to do so.

## **Conflict of Interest and Disclosure**

If you're asking yourself, "Is this a conflict of interest?" it likely is. Readers are also a good barometer for this; take a moment to consider whether the reader would see a conflict of interest. Writers and editors should disclose if they have a financial or personal stake — Is the subject a friend or significant other? Have you disclosed this? — in the issue they are covering. Reporters should not have a financial stake in a company in the industry they cover. Check with your editor about whether disclosure is enough, or whether the story should be reassigned.

## **Customer Service Complaints**

Reporters and editors should not use their work-related email accounts, social media accounts, or other BuzzFeed-related platforms to seek customer service assistance. It's fine, however, to tweet in general about issues with, say, the subways or other private or public services, as long as you aren't seeking — or receiving — special treatment. For example:

*Not okay:* "@apple, I can't get face unlock working on my iPhone X. Little help?"

"@frontiercares I paid for extra legroom but my knees are \*completely\* jammed up against the seat in front of me."

## **Disclosing Provided Materials**

We should note when items such as clothing or appliances have been furnished to us for review. When an item or items was/were provided and used in the test kitchen or as part of a photo shoot, but not reviewed, writers should disclose that at the bottom of the post.

## **Fundraising**

Reporters and editors should not fundraise for organizations BuzzFeed News covers, with the exception of professional groups and organizations primarily advocating the defense of a free press. Reporters shouldn't give money to groups they cover. And while there is of course no reason not to give charitable contributions, staffers should obviously be aware that those may not remain private.

## **Gifts**

Gifts that aren't review material (books, music, DVDs) or edible typically should be returned or donated. A rough guide — though imperfect — for determining if you can keep a gift is whether the item costs \$25 or less. If it costs more than \$25, talk to your editor.

## **Graphic Content**



will embed or link to the graphic content we are writing about. On our owned-and-operated platforms, we also have technical tools that give our readers the opportunity to opt in to view graphic content.

Marking a post NSFW in the CMS prevents it from going into our 13+ BuzzFeed app.

- *Profanity*: We speak the language of the internet — which is often hilarious and often profane. As such, profanity is permitted on BuzzFeed; but see the BuzzFeed Style Guide for more information on how to style it responsibly.
- *Sex and nudity*: Nudity or sex should be avoided if it's prurient or pornographic. Newsworthy or artistic nudity or instructional sexual content can be posted as long as the post has been clearly marked NSFW in the deck and in the CMS.
- *Violence*: Images that show blood, gore, or violent abuse should be covered with the graphic overlay tool, allowing readers to click if they wish to see the images. These posts should be marked "sensitive" in the CMS. When covering extreme violence or death, use discretion when embedding — sometimes it's best to link out.

If you have questions about whether you should post something because of its graphic nature, talk to your editor and/or the manager on duty.

## Interviews

Giving a subject a general sense of the direction of the interview is fine, but we should decline to provide questions to subjects in advance of an in-person interview. Interviews conducted over email, Facebook Messenger, or Gchat are permitted — but in-person, video, and telephone interviews are often more valuable.

Do not be gratuitous with a shooter's name, photo, and video in posts, headlines, thumbnails and social shares, and on platforms; because it exists doesn't mean we automatically run it. Don't censor the facts/news when naming a shooter, or using a photo, or discussing the motive when it is necessary in the moment and during follow-up reporting. Use judgment each time.

## **Opinion**

When BuzzFeed News publishes opinion pieces, they should be clearly labeled as opinion, both on the article page and in any social promotion. Our publication of these pieces does not mean an endorsement of the views contained within them. However, we seek to publish only opinion pieces that we believe were written in good faith, by people who we believe have a credible history of good-faith participation in the public sphere, and add a unique voice to the public debate around a topic of news value.

Our opinion section welcomes commentary from people with diverse political views, but it is not a place for trolls, dishonesty, or spin.

## **Outside Income**

BuzzFeed News staffers who make money for work done outside of the company should disclose that information when they are hired. We discourage most freelance writing because we love your work and would like to publish the best things you write on BuzzFeed, but there are occasional exceptions. If you're doing something BuzzFeed would publish — pretty much anything but a novel or a screenplay — we'd like to run it. Please consult your manager if you think we should make an exception, and we'll consider it on a case-by-case basis.

We try to accommodate all book deals and will in most cases offer up to six months of unpaid book leave. If you're thinking of writing a book, please consult your manager first. Contract work and paid speaking engagements will be considered on a case-by-case basis and should also be cleared with your manager and PR. Staffers who do outside work related to the field they cover should adhere to the ethical guidelines set forth in this document for their personal work as well. If a staffer is making outside income from a specific company, that staffer is not permitted to write about that company.

BuzzFeed News staffers should not cover any individual, organization, or service in which they have a financial interest. Staffers are not permitted to invest in companies they cover. Staff may not buy, sell, or in any way trade in stocks, funds, or currencies based on stories BuzzFeed News will publish. Staffers may not short any financial instruments.

## **Photography**

Our original photography and image selection should not attempt to deceive the reader in any way. Subjects should be shown in the reality of the moment they are captured in. Materially manipulating images — such as reversing, distorting, or adding/removing people — is not allowed except in the cases of creating a photo illustration, which the caption will note. Minor adjustments to cropping, color, sharpening, etc., that do not materially change the photograph are permissible.

## **Political Speech**

Reporters and editors should refrain from expressing partisan opinions about candidates, policy, and other public issues that BuzzFeed News covers. News staffers are not permitted to donate money or volunteer time for political candidates or campaigns, or to participate in demonstrations.

We do, however, expect reporters to engage in conversations on social media, legacy media, events, and street corners on subjects in which they have expertise or interest. In all those contexts, reporters should avoid saying things they wouldn't say in a news article or broadcast — that is, statements they can't back with reporting. And reporters should generally consider the value of commentary that may make their colleagues' work harder on specific beats. (Culture writers, whose work may be more overtly political or opinionated, should hold their comments to the same standards they do in their work.)

## Privacy

Digital media — the ubiquity of recording, the vast quantity of speech on social media, the power of search — has changed how regular people think about the principles of free speech. We believe deeply in those principles and in our right to report public information. But we also believe journalists must adjust to changing norms, and focus on defending and defining the right to reveal the secrets that matter.

We expect our reporters to consider context in three categories of privacy decisions, and to be particularly sensitive when it comes to minors:

- *Search engine indexing*: In some cases, we may identify a person by a version of their name other than the one that is widely used in searches, or anonymize them entirely, if it can be done in a way that does not substantially distort the reporting and may protect that person from having, for instance, the worst day of their life perpetually define their online identity.
- *Social media*: We should be attentive to the intended audience for a social media post, and whether vastly increasing that audience reveals an important story — or just shames or embarrasses a random person.

We should not automatically or even typically comply with a poster's

## Products

BuzzFeed News writers can accept and may request samples of consumer products for evaluation or for photo shoots (as props or construction material). These materials should stay at the office or at BuzzFeed's photo studios.

BuzzFeed News staffers should request media that they are potentially interested in writing about (books, screeners, albums, etc.). Physical materials are often provided for review purposes, like concert tickets, DVD screeners, etc.

## Pseudonyms

Freelancers and regular contributors should write under their own names or their professional pen names. We may make occasional exceptions for freelancers writing on important but sensitive topics, or for correspondents working on countries where journalism is dangerous or illegal. If you don't feel comfortable publishing under your own name, there are likely problems with the story that need to be addressed.

## Selfies

Selfies are fantastic and you should take them as often as possible with friends and loved ones. But BuzzFeed News reporters should use good judgment when taking images with their subjects. Ultimately, all staffers should answer this question when it comes to photographs:

## **Source Meetings Over Meals or Drinks**

BuzzFeed staffers should seek to pay costs incurred over the course of an interview or source meeting over a meal or drink.

## **Travel, Junkets, and Set Visits**

We are happy that we are able to send staffers to report and cover events. If there is a journalistic reason for a BuzzFeed News reporter to accept travel and/or lodging provided for or arranged by a source, BuzzFeed News will reimburse the source with an amount equivalent to what we would have paid for commercial travel. Where this isn’t feasible, we will disclose where we’ve accepted travel or lodging.

## **The Editorial and Business Relationship**

BuzzFeed News relies deeply on the trust of our readers that we are bringing them accurate reporting, great storytelling, and useful service — and so we maintain a strict and traditional separation between advertising and editorial content.

## **Ad Campaigns**

We don't write about ads that are running on BuzzFeed unless they are genuinely newsworthy.



As BuzzFeed expands, we're going to be in more situations where BuzzFeed News is covering projects of people who have an affiliation with BuzzFeed.com or other aspects of the company. When we're writing about someone who is affiliated with BFDC in any capacity, we should disclose that relationship.

This should be done in italics at the bottom of a post in the following way:

*Disclosure: [Name] is an adviser [or another title] to BuzzFeed.com, which is part of the same company as BuzzFeed News.*

## **BuzzFeed Investors**

Our investors have no influence on our reporting, and reporters should not take any special note of investors' views or interests. When we cover people who are investors in BuzzFeed, typically it is because of their other business interests. Editors, not reporters, are responsible for noting whether a subject is an investor. In those cases, we should disclose that relationship with a parenthetical sentence in the running text after mentioning their name: "*([Name/company] is an investor in BuzzFeed.)*"

## **Cross-BuzzFeed Collaboration**

BuzzFeed News maintains a divide between advertising and editorial staff. However, management-level editorial employees may be asked to vet certain sponsorships or projects. Some forms of advertising — including video integrations and advertisements in podcasts — may also involve staffers' participation in a clearly disclosed form.

## **Distribution Partners**

BuzzFeed has business relationships with platforms ranging from

social networks to television channels, under which BuzzFeed is paid

some other arrangement. BuzzFeed News staffers should disclose these distribution relationships when we are writing about the specific product or program involved in the relationship. For instance, we should disclose that BuzzFeed has a Snapchat Discover channel when we are writing about Snapchat Discover as a product, or about Snapchat's strategy around media partnerships. It is not necessary to disclose this relationship at every mention of the partner. Editors, not reporters, are responsible for noting whether a subject is a partner.

## UPDATE

November 2, 2018, at 11:36 a.m.

This post now includes guidelines on covering mass shootings, as well as updated guidelines on outside income and sourcing.

## UPDATE

January 5, 2018, at 6:02 a.m.

This post now includes updated guidelines on customer service complaints, fundraising, and political speech, as well as new guidelines on privacy and opinion.



Shani Hilton is the VP of news and programming for BuzzFeed News and is based in New York.

Contact [Shani O. Hilton](#) at [shani.hilton@buzzfeed.com](mailto:shani.hilton@buzzfeed.com).

Got a confidential tip? [Submit it here](#).

# EXHIBIT 26

# In A New Email, Elon Musk Accused A Cave Rescuer Of Being A "Child Rapist" And Said He "Hopes" There's A Lawsuit

In an email to BuzzFeed News, Tesla CEO Elon Musk accused a Thai cave rescuer of moving to Thailand to take a child bride. The rescuer denied all the claims.

Ryan Mac

Posted on September 4, 2018, at 5:04 p.m. ET

*Soe Zeya Tun / Reuters*

British caver Vernon Unsworth at the Tham Luang cave complex during a search for members of a soccer team and their coach in Thailand in June.

Tesla CEO Elon Musk has renewed his attacks against a British man who played a key role in the rescue of a youth soccer team trapped in a flooded cave in Thailand.

Musk last month apologized for accusing Vernon Unsworth of pedophilia after the diver questioned the value of Musk's contribution to the rescue, a small submarine that ultimately went unused. But in a series of emails to BuzzFeed News, Musk repeated his original attacks on Unsworth — and made new and specific claims, lambasting the rescuer as a "child rapist" who had moved to the Southeast Asian country to take a child bride. Unsworth denied Musk's accusations through his attorney.

Though Musk prefaced one email with "off the record," BuzzFeed News did

not agree to that condition of the correspondence. (Per common journalistic practice, a conversation is off the record only if both parties agree to the terms. )

BuzzFeed News first emailed Musk last Wednesday to ask for comment regarding a legal threat made by Unsworth's lawyer in August after the Tesla CEO renewed his apparently evidenceless criticism of the rescuer in a Twitter argument the day before. Musk responded without addressing the substance of the legal threat. BuzzFeed News followed up twice, once on Wednesday and once on Thursday, and Musk responded with two separate emails.

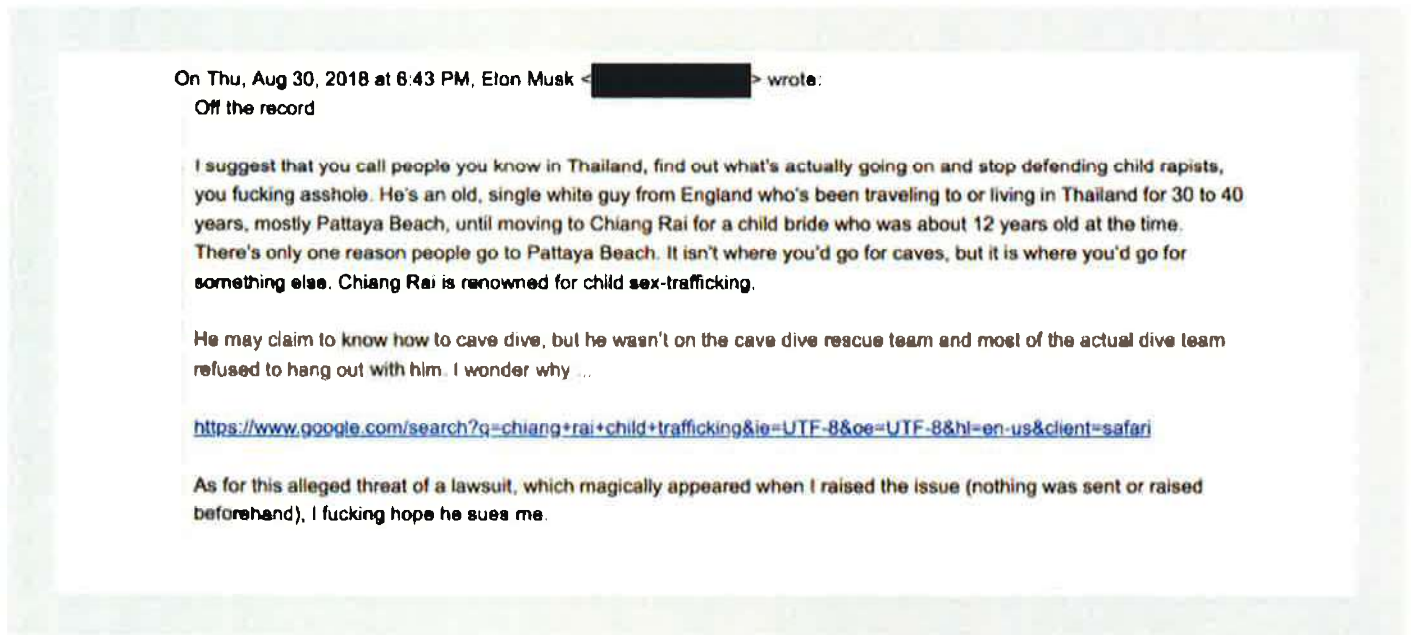
***"I suggest that you call people you know in Thailand, find out what's actually going on and stop defending child rapists, you fucking asshole."***

"I suggest that you call people you know in Thailand, find out what's actually going on and stop defending child rapists, you fucking asshole," Musk wrote in the first message. "He's an old, single white guy from England who's been traveling to or living in Thailand for 30 to 40 years, mostly Pattaya Beach, until moving to Chiang Rai for a child bride who was about 12 years old at the time."

"As for this alleged threat of a lawsuit, which magically appeared when I raised the issue (nothing was sent or raised beforehand), I fucking hope he sues me," he added.

It is unclear why Musk believes the allegations against Unsworth or what evidence he has to support them. Musk did not provide proof of his claims

to BuzzFeed News, and BuzzFeed News could not verify any of the claims after reporting on Unsworth's background.



#### *BuzzFeed News*

The Tesla CEO's continued campaign against Unsworth offers a glimpse into the new ability of some of the world's wealthiest and most powerful figures to directly attack private citizens who cross them — and will test the capacity of traditional legal tools against them.

"Elon Musk can tweet his vindictive and vicious lie about Mr. Unsworth a hundred times and it will still be a lie," Unsworth's lawyer, L. Lin Wood, wrote in a statement. "After deleting the initial accusation and tweeting an apology, Mr Musk has continued to republish his false and unsupportable accusation. His conduct demonstrates that his recklessness is intentional and designed to harm Mr. Unsworth."

A spokesperson for Tesla did not immediately return a request for comment on Musk's newest allegations, and referred to a previous statement issued by the board in response to a question about its support for the company's CEO.



The feud began in July when Musk tweeted that Unsworth was “a pedo guy” after the rescuer called the billionaire’s attempt to use a custom-designed submarine in the rescue effort a “publicity stunt.” Musk later apologized and deleted this tweets, but revisited the claim last week in an argument on Twitter, asking why Unsworth hadn’t sued yet if the accusations were indeed untrue. BuzzFeed News then reported that Wood had actually sent Musk a letter warning of a possible defamation suit in early August.

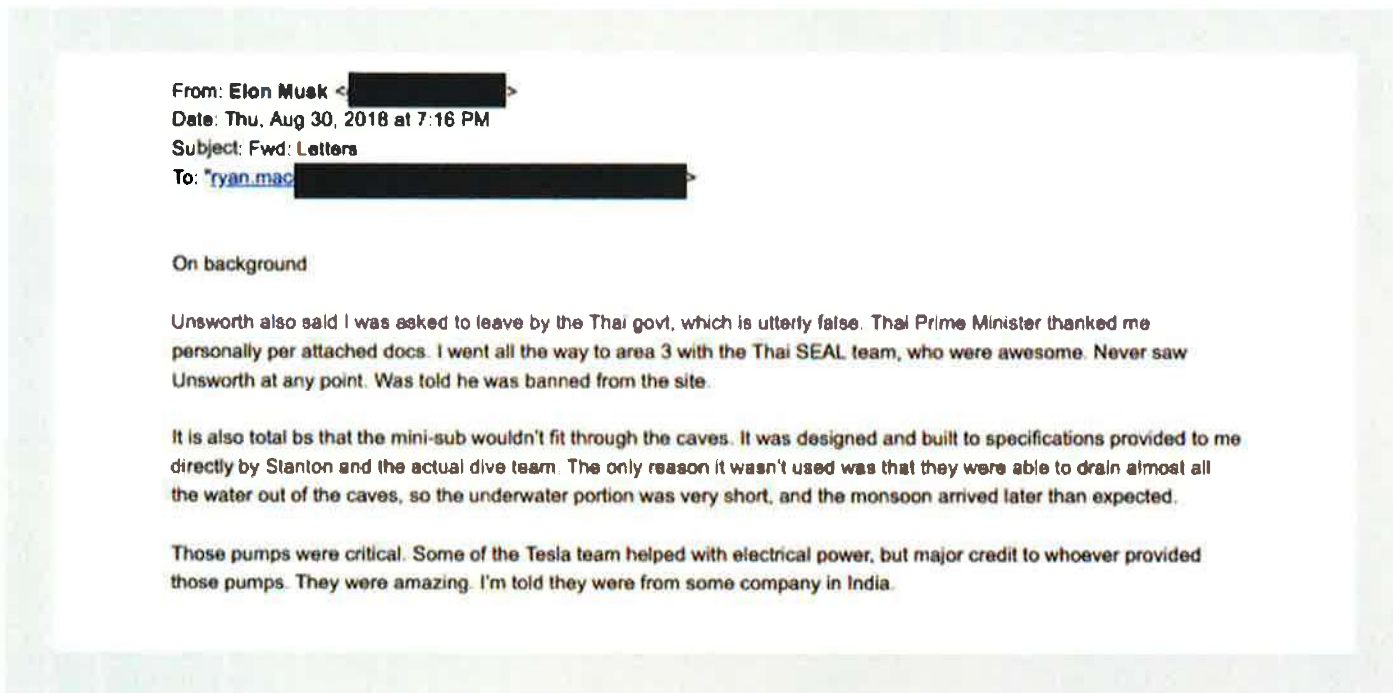
Musk’s renewed attacks on Unsworth come after a series of erratic public gestures, notably a widely publicized suggestion that he would take Tesla private and the narration of his home life by the rapper Azealia Banks. And the new accusations leveled at Unsworth threaten to undermine a recent charm offensive intended to frame the CEO’s erratic behavior as the actions of an overworked luminary struggling to maintain his world-changing businesses. It’s been a particularly difficult summer for the billionaire, marked by Tesla’s missed production goals, clashes with reporters, and his failed attempt to take his car company private.

Despite that, Musk still managed to maintain a dispute with Unsworth, a 63-year-old cave explorer and diver, whom he has now accused of taking a child bride.

BuzzFeed News could find no evidence to support that claim, and Musk did not provide any documentation to support his accusations. Publicly available legal documents do nothing to support Musk’s claims: BuzzFeed News could not immediately locate any criminal records for Unsworth in the UK.

Separately, a Thai immigration official named Ploy Pailin told BuzzFeed News that an individual on a visa would likely not have it renewed if they had

been found guilty of criminal activity in the country. Pailin also said that while foreigners applying for visas in Thailand do not undergo mandatory background checks, those who are found guilty of serious crimes are often blacklisted by the government and can be removed from the country.



*BuzzFeed News*

BuzzFeed News also spoke with [Woranan Ratrawiphukkun](#), a Thai woman who is Unsworth's longtime girlfriend. She said she had been with Unsworth for more than seven years and has posted numerous photos about their relationship on social media dating back several years. Unsworth, she added, spends part of the year in Thailand and part of the time in the UK.

[Ratrawiphukkun](#), who said she is 40, declined to comment on Musk's allegations against Unsworth, and referred a reporter to his lawyers.

Among Musk's other claims about Unsworth is that he was not part of the actual dive team in the Thailand cave rescue. While Unsworth did not dive for the mission, media reports and other people who were part of the rescue cited the Brit as instrumental to the effort, as he had previously

mapped and explored some of the cave system and recruited some of the divers who went into the cave.

"He may claim to know how to cave dive, but he wasn't on the cave dive rescue team and most of the actual dive team refused to hang out with him," Musk wrote in one email. In another email in which Musk wrote "on background" — BuzzFeed News again did not agree to these terms — the Tesla CEO said, "Never saw Unsworth at any point. Was told he was banned from the site."

A British diver on the rescue mission who had previously been in contact with Musk, Rick Stanton, denied those claims.

"I've no idea what gave you those concerns about Vern," Stanton wrote over Facebook Messenger. "They are completely unfounded. He was never kicked off site by anyone and worked continuously on the rescue for the full duration. He was pivotal to the entire operation."

Two Australian specialists who were brought in by the Thai government to aid the Thai cave rescue operation, Richard Harris and Craig Challen, also rejected Musk's allegation.

"Vern seemed like an excellent guy and absolutely vital to the mission," said Harris, who, with Challen, helped in the sedation of the Thai boys before they were brought out of the cave by the British divers. "You must be confusing him with someone else."

"He was pivotal with his knowledge of the cave. [The] rescue wouldn't have happened without him recommending the Brits were called," Harris said.

Photos and videos posted on Facebook by Woranan and members of the local Thai news media show Unsworth at the site through the duration of

the operation, which lasted more than two weeks in the country's Chiang Rai province. Some of those photos show Unsworth posing with other British members involved with the rescue.

In his second email to BuzzFeed News, Musk commented on Unsworth's interview with CNN.

"Unsworth also said I was asked to leave by the Thai govt, which is utterly false. Thai Prime Minister thanked me personally per attached docs. I went all the way to area 3 with the Thai SEAL team, who were awesome."

Unsworth did say that Musk was asked to leave the cave in the interview, but did not specify who had asked him.

Musk also supplied a letter to BuzzFeed News from the Thai prime minister thanking him for his team's involvement in the rescue. "I wish to convey my deep appreciation to you and your engineering team for your expeditious and extraordinary efforts in constructing the Space-X mini-submarine 'Wild Boar' to assist the rescue operation of the Moo Pa Academy Football team trapped in Tham Luang Cave, Chiang Rai province," wrote General Prayut Chan-o-cha.

Office of the Prime Minister,  
Government House,  
BANGKOK.

26 July B.E. 2561 (2018)

Dear Mr. Musk,

I wish to convey my deep appreciation to you and your engineering team for your expeditious and extraordinary efforts in constructing the Space-X mini-submarine "Wild Boar" to assist the rescue operation of the Moo Pa Academy Football team trapped in Tham Luang Cave, Chiang Rai Province.

I am particularly touched that you personally travelled to Thailand to deliver the “Wild Boar” Space-X mini-sub, which was made possible through your expertise and the cooperation with various experts involved with this highly complicated and urgent rescue operation. Your initiative and involvement indeed exemplifies the significance of compassion and ingenuity in responding to extremely complex and life-threatening situations. Furthermore, the endeavour of courage and determination by all who took part in this perilous operation, both Thai and foreign, is testament to what can be achieved in the face of seemingly unsurmountable odds. The rescue has inspired people around the world and reaffirmed our faith in the power of solidarity and cooperation in times of crises. Indeed, this historic episode of immediate assistance and resolve demonstrates humanity at its best.

Looking ahead, I hope that you will have a chance to visit Thailand again soon. I believe that there are many opportunities for us to cooperate on, especially on how to harness technology and innovation for the benefit of sustainable development and towards enhancing the well-being of all global citizens.

I would like to extend to you my best wishes for your good health and success.

**Yours sincerely,**

General *Prayut Chao* (Ret.)  
(Prayut Chan-o-cha)

**Prime Minister of the Kingdom of Thailand**

Mr. Elon Musk,  
Chief Executive Officer,  
Space Exploration Technologies Corporation,  
**CALIFORNIA.**

*Elon Musk provided to BuzzFeed News*

In addition, Musk claimed that the mini-sub, which ultimately was not used in the rescue, was built to Stanton's specifications, and that it was not deployed only because too much water had been drained from the cave. Stanton, however, denied that was the reason, and said he did not recall providing exact specifications to Musk.

"We didn't use the tube because rescue operations were already well underway and it didn't have the necessary life support systems," Stanton said to BuzzFeed News on Facebook Messenger. "Essentially, it wasn't developed enough. I do think it has promise in certain situations and I hope they keep working on it to get it in shape for evaluation and to be considered as a viable alternative in future underwater rescue scenarios."

In another claim, Musk noted that "the alleged threat of a lawsuit" from Unsworth "magically appeared when I raised the issue" on Twitter last week and that nothing had been sent prior to his outburst. L. Lin Wood, Unsworth's lawyer, provided BuzzFeed News with confirmation showing that he had sent a note titled "Fwd: Defamation of Vernon Unsworth" containing the legal letter to the appropriate email address for Musk's office at SpaceX on Aug. 6.

BuzzFeed News corresponded with the Tesla and SpaceX CEO at a separate, personal email address that two sources confirmed belonged to Musk. One source, who had previously worked for Musk, noted that the email address can be accessed by the billionaire and his assistants. The source noted that it was not uncommon for Musk to personally respond to reporters and other people through that account.

Wood did not respond to questions asking him to more specifically address each of Musk's accusations, but suggested that he was moving closer to



legal action.

"Today the rich and powerful seem all too ready to tweet falsities in the hope and expectation that their wealth and position will protect them," he wrote in a statement. "Pedophilia is too serious an issue to leave unchallenged. If Mr. Musk believes his wealth affords him protection from his lies and Twibels, he is sadly mistaken."

### **Here are the emails Elon Musk sent to BuzzFeed News reporter Ryan Mac**

From: Elon Musk <redacted >

Date: Thu, Aug 30, 2018 at 6:43 PM

Subject: RE: BuzzFeed News: Unsworth legal letter

To: "ryan.mac@buzzfeed.com"

Off the record

I suggest that you call people you know in Thailand, find out what's actually going on and stop defending child rapists, you fucking asshole. He's an old, single white guy from England who's been traveling to or living in Thailand for 30 to 40 years, mostly Pattaya Beach, until moving to Chiang Rai for a child bride who was about 12 years old at the time. There's only one reason people go to Pattaya Beach. It isn't where you'd go for caves, but it is where you'd go for something else. Chiang Rai is renowned for child sex-trafficking.

He may claim to know how to cave dive, but he wasn't on the cave dive rescue team and most of the actual dive team refused to hang out with him. I wonder why ...

[https://www.google.com/search?  
q=chiang+rai+child+trafficking&ie=UTF-8&oe=UTF-8&hl=en-  
us&client=safari](https://www.google.com/search?q=chiang+rai+child+trafficking&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari)

As for this alleged threat of a lawsuit, which magically appeared when I raised the issue (nothing was sent or raised beforehand), I fucking hope he sues me.

\*\*\*

From: Elon Musk <redacted >

Date: Thu, Aug 30, 2018 at 7:16 PM

Subject: Fwd: Letters

To: "ryan.mac@buzzfeed.com"

On background

Unsworth also said I was asked to leave by the Thai govt, which is utterly false. Thai Prime Minister thanked me personally per attached docs. I went all the way to area 3 with the Thai SEAL team, who were awesome. Never saw Unsworth at any point. Was told he was banned from the site.

It is also total bs that the mini-sub wouldn't fit through the caves. It was designed and built to specifications provided to me directly by Stanton and the actual dive team. The only reason it wasn't used was that they were able to drain almost all the water out of the caves, so the underwater portion was very short, and the monsoon arrived later than expected.

Those pumps were critical. Some of the Tesla team helped with electrical

power, but major credit to whoever provided those pumps. They were amazing. I'm told they were from some company in India.

**Help us break more stories. If you want to support reporting like this, [make a contribution to BuzzFeed News](#).**

# EXHIBIT 27

**Transcript of July 16, 2018 Interview with TIME**

**Mr. Unsworth:** It's not finished.

**TIME Reporter:** How disrespectful was he to you?

**Mr. Unsworth:** I believe he's called me a pedophile. Well, by definition, you know, rescuing 12 young boys, by definition, that puts everyone else in the same context.

**TIME Reporter:** After everything you've done, how does it make you feel when you goes and puts that out there to the world?

**Mr. Unsworth:** I'm not going to make any further comment about him, but I think people realize what sort of guy he is.

**Additional Reporter:** Would you consider taking legal action against him?

**Mr. Unsworth:** Yes. Yes. It's not finished.